| | |
|---|---|
| **From:** | David P. Garrett |
| **To:** | Bunker, Byron; John.Finneran@dot.gov |
| **Cc:** | Wehrly, Linc; Wright, DavidA; Maurice.Hicks@dot.gov; Richard W. Amann; Doug DeVries; Randall J. Reich |
| **Subject:** | follow-up from May 25, 2016 meeting on 2016 MY Fuel Economy Label Error |
| **Date:** | Thursday, May 26, 2016 3:42:51 PM |
| **Attachments:** | 2016 Lambda FE Label Error_EPA-NHTSA review_2016-05-25.pdf<br>2016 Lambda FE Label Error_EPA follow-up_ADFE.pdf |

Dear Mr. Bunker and Mr. Finneran,

We appreciate the opportunity to meet with you and members of your respective staffs yesterday to respond to EPA's request from May 13, 2016 to investigate reasons for differences in fuel consumption of 2009 Data Vehicle and 2016 Data Vehicle, and to NHTSA's questions received May 19, 2016 seeking information regarding discovery, root cause, applicability, and actions taken to resolve the Fuel Economy label error on our 2016 MY Chevrolet Traverse, Buick Enclave, and GMC Acadia vehicles. As we discussed at the outset of the meeting, our intent was to provide an integrated response to both EPA's and NHTSA's questions.

Our presentation provided a description of how this inadvertent error on this 2016 MY Fuel Economy label error occurred, how and when we learned of the error, and our timely actions to self-disclose, investigate, and take actions to address the error. We also reviewed the official test results from all data vehicles tested in support of these models' annual emissions certification and fuel economy labeling for the entire lifecycle of this vehicle program, since it was launched during the 2007 MY through 2016 MY. This information shows that GM ran new data vehicle tests when required and followed EPA's guidance on the carry-over of data. In addition, we reviewed data from annual development testing which demonstrates fuel economy equivalence, providing support for carry-over of test results from the 2009 MY FE Data Vehicle to subsequent Model Years.

To address EPA's specific request " ... to investigate the potential impact of the integrated work over the drive cycle (i.e., drive cycle metrics).", we reviewed the drive trace metrics from the original 2009 MY Fuel Economy Data Vehicle (FEDV) test as well as the 2016 MY Emission Data Vehicle (EDV) test. The 2009 MY FEDV test was executed according to EPA's drive trace validation criteria in effect at the time. The 2016 MY EDV test was conducted according to guidance EPA introduced during a May 2013 Industry workshop to reduce variation and improve rigor of Fuel Economy label values.

A copy of the material we presented during the meeting yesterday is attached to this message. Please note that pages 24-25 are marked GM CONFIDENTIAL because they contain non-public information the disclosure of which could cause GM competitive harm. We request EPA and NHTSA provide confidential treatment of those pages pursuant to 40 CFR Part 2 and 49 CFR Part 512.

As requested during our meeting, we have prepared Analytically-Derived Fuel Economy (ADFE) calculations of the 2009 MY FEDV and 2016 MY EDV test results to a common basis. The vehicle model used for comparison is a 2016 MY Chevrolet Traverse FWD vehicle, one of the vehicles impacted by this error. This ADFE comparison is summarized in a separate attachment to this email.

Thank you again for the opportunity to review and discuss this information with you and members of your respective staffs.

Please contact me if you have any questions.

Best Regards,

Dave.

David P. Garrett
Director, Global Vehicle Emission Compliance
General Motors LLC

(b) (6) [redacted] office
mobile
david.p.garrett@gm.com

# FUEL ECONOMY LABEL ERROR

## 2016 MY Chevrolet Traverse, Buick Enclave, GMC Acadia

*EPA Office of Transportation and Air Quality, Compliance Division*
*and*
*NHTSA Office of Vehicle Safety Compliance*

*National Vehicle and Fuel Emissions Laboratory*
*Ann Arbor, MI*
*May 25, 2016*

GENERAL MOTORS

# OUTLINE

EPA Request from May 13, 2016

Investigate reasons for differences in fuel consumption of 2009 Data Vehicle and 2016 Data Vehicle

NHTSA Questions received May 19, 2016

Seeking information regarding discovery, root cause, applicability, and actions taken to resolve the error

# EPA REQUEST

Investigate reason for differences in fuel consumption of 2009 Data Vehicle and 2016 Data Vehicle

- Year-by-year summary of Emission and FE Data Vehicles
- Drive Cycle Metrics
  - Impact of integrated work over drive cycle
- Year-by-year comparison of City and Hwy "FE Equivalence"
- Year-by-year summary of Running Changes

# 2009 MY FEDV vs 2016 MY EDV

Official 2009 MY testing occurred in 2008 CY

- Emission Data Vehicle (EDV): Feb-March 2008
- Fuel Economy Data Vehicle (FEDV): June 2008

Official 2016 MY testing occurred in 2015 CY

- Emission Data Vehicle (EDV): Jan-Feb 2015
- No separate Fuel Economy Data Vehicle (FEDV)

# REQUIREMENTS FOR DATA VEHICLE SELECTIONS

## 40 CFR 86.1828

**Emission Data Vehicle Selection** (EDV)

EDV represents the heaviest test weight class, highest total roadload, and highest N/V ratio that is expected to be the worst case for emissions.

## 40 CFR 600.010

**Fuel Economy Data Vehicle Selection** (FEDV)

The highest projected MY sales subconfiguration within the highest projected MY sales configuration for each base level

# EMISSION DATA VEHICLES (EDV) AND FUEL ECONOMY DATA VEHICLES (FEDV)
## key program content changes 2007 – 2016 MY

### 2007 New EDV, New FEDV
- All new vehicle program; PFI engine (LY7), all new 6spd FWD trans
- Saturn Outlook and GMC Acadia models only
  - Buick Enclave introduced in 2008 MY, but did not create new "worst case" for EDV
- Bin5/LEV2 2 close-coupled catalytic converters

### 2009 New EDV, New FEDV
- Bin5/ULEV2 2 close-coupled + 1 underfloor catalytic converters
- New E69 ECM
- New Direct Injection engine (LLT)
- Chevrolet Traverse model introduced;
- Add'l content on Buick Enclave AWD creates new "worst case" for EDV

### 2012 New EDV, *NO new FEDV*
- Bin4 (ULEV2) new 2 close-coupled + 1 underfloor catalytic converters
- New E39 ECM

### 2016 New EDV, *NO new FEDV*
- 150k Bin5/ULEV 125 new 2 close-coupled + 1 underfloor catalytic converters

# EMISSION DATA VEHICLES (EDV) AND FUEL ECONOMY DATA VEHICLES (FEDV) 2007 – 2016 MY

**New DV test results**
Carryover Data

| Model Year | Vehicle ID | DV Type | TWC | RLHP | N/V | City FE | Hwy FE | UAC | Model represented |
|---|---|---|---|---|---|---|---|---|---|
| **2007** | **3657ZN4008** | **EDV** | **5250** | **19.0** | **26.2** | **18.6** | **28.7** | | **Saturn AWD** |
| | **3687UP8002** | **FEDV** | **5250** | **18.4** | **26.2** | **19.3** | **31.0** | | **GMC AWD** |
| | **3687UP8002** | **FEDV** | **5000** | **16.8** | **26.2** | **20.1** | **33.5** | | **GMC FWD** |
| **2008** | 3657ZN4008 | EDV | 5250 | 19.0 | 26.2 | 18.6 | 28.7 | | Saturn AWD |
| | 3687UP8002 | FEDV | 5250 | 18.4 | 26.2 | 19.3 | 31 | | GMC AWD |
| | 3687UP8002 | FEDV | 5000 | 16.8 | 26.2 | 20.1 | 33.5 | | GMC FWD |
| **2009** | **3659ZN4008** | **EDV** | **5500** | **19.3** | **26.1** | **17.4** | **28.6** | **21.1** | **Buick AWD** |
| | **3689ZP8000** | **FEDV** | **5500** | **18.9** | **26.2** | **19.5** | **30.9** | **23.4** | **Buick AWD** |
| **2010** | 3659ZN4008 | EDV | 5500 | 19.3 | 26.1 | 17.4 | 28.6 | 21.1 | Buick AWD |
| | 3689ZP8000 | FEDV | 5500 | 18.9 | 26.2 | 19.5 | 30.9 | 23.4 | Buick AWD |
| **2011** | 3659ZN4008 | EDV | 5500 | 19.3 | 26.1 | 17.4 | 28.6 | 21.1 | Buick AWD |
| | 3689ZP8000 | FEDV | 5500 | 18.9 | 26.2 | 19.5 | 30.9 | 23.4 | Buick AWD |
| **2012** | **3619ZP5022** | **EDV** | **5500** | **19.5** | **26.1** | **17.1** | **26.9** | **20.5** | **Buick AWD** |
| | 3659ZN4008 | EDV | 5500 | 19.3 | 26.1 | 17.4 | 28.6 | 21.1 | Buick AWD |
| | 3689ZP8000 | FEDV | 5500 | 18.9 | 26.2 | 19.5 | 30.9 | 23.4 | Buick AWD |
| **2013** | 3619ZP5022 | EDV | 5500 | 19.5 | 26.1 | 17.1 | 26.9 | 20.5 | Buick AWD |
| | 3659ZN4008 | EDV | 5500 | 19.3 | 26.1 | 17.4 | 28.6 | 21.1 | Buick AWD |
| | 3689ZP8000 | FEDV | 5500 | 18.9 | 26.2 | 19.5 | 30.9 | 23.4 | Buick AWD |
| **2014** | 3619ZP5022 | EDV | 5500 | 19.5 | 26.1 | 17.1 | 26.9 | 20.5 | Buick AWD |
| | 3659ZN4008 | EDV | 5500 | 19.3 | 26.1 | 17.4 | 28.6 | 21.1 | Buick AWD |
| | 3689ZP8000 | FEDV | 5500 | 18.9 | 26.2 | 19.5 | 30.9 | 23.4 | Buick AWD |
| **2015** | 3619ZP5022 | EDV | 5500 | 19.5 | 26.1 | 17.1 | 26.9 | 20.5 | Buick AWD |
| | 3659ZN4008 | EDV | 5500 | 19.3 | 26.1 | 17.4 | 28.6 | 21.1 | Buick AWD |
| | 3689ZP8000 | FEDV | 5500 | 18.9 | 26.2 | 19.5 | 30.9 | 23.4 | Buick AWD |
| **2016** | **361FVP6999** | **EDV** | **5500** | **18.4** | **26.0** | **17.6** | **29.2** | **21.4** | **Buick AWD** |
| | 3619ZP5022 | EDV | 5500 | 19.5 | 26.1 | 17.1 | 26.9 | 20.5 | Buick AWD |
| | 3659ZN4008 | EDV | 5500 | 19.3 | 26.1 | 17.4 | 28.6 | 21.1 | Buick AWD |
| | 3689ZP8000 | FEDV | 5500 | 18.9 | 26.2 | 19.5 | 30.9 | 23.4 | Buick AWD |

# EPA REQUEST

Investigate reason for differences in fuel consumption of 2009 Data Vehicle and 2016 Data vehicle

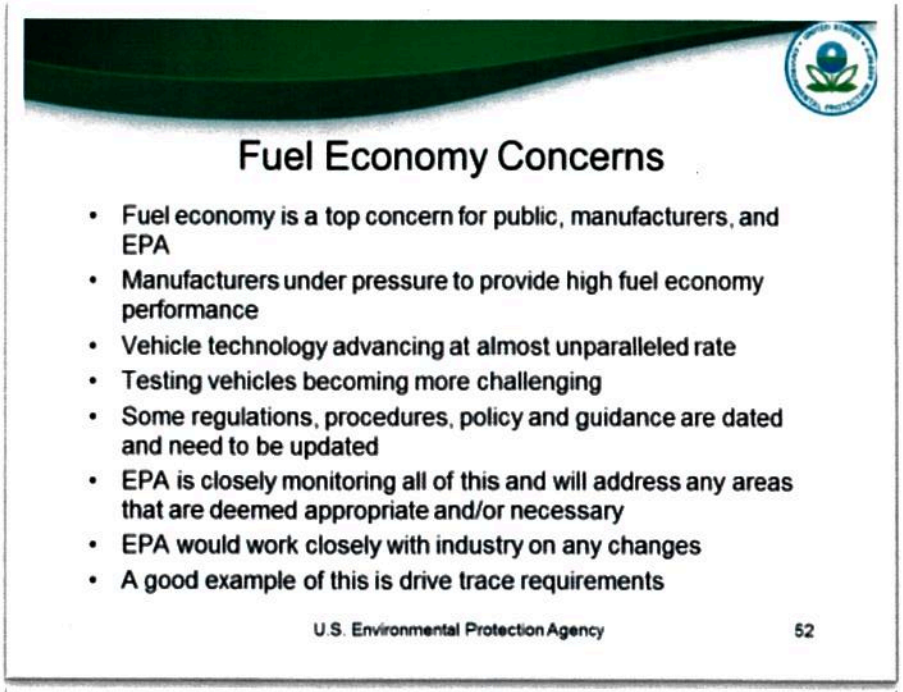
- 
- Drive Cycle Metrics
  Impact of integrated work over drive cycle
- 
- 

# MAY 2013 EPA/INDUSTRY LIGHT-DUTY VEHICLE COMPLIANCE MEETING

EPA presentation and discussion:

- recognized Fuel Economy Concerns

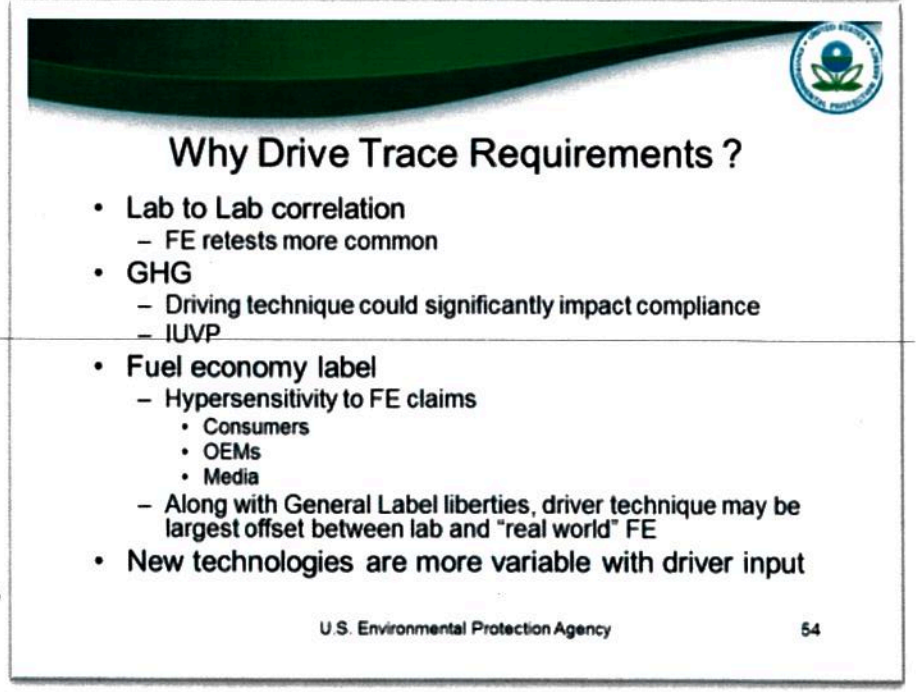
- introduced Drive Trace Requirements to reduce variation and improve rigor of FE label values



## Fuel Economy Concerns

- Fuel economy is a top concern for public, manufacturers, and EPA
- Manufacturers under pressure to provide high fuel economy performance
- Vehicle technology advancing at almost unparalleled rate
- Testing vehicles becoming more challenging
- Some regulations, procedures, policy and guidance are dated and need to be updated
- EPA is closely monitoring all of this and will address any areas that are deemed appropriate and/or necessary
- EPA would work closely with industry on any changes
- A good example of this is drive trace requirements

U.S. Environmental Protection Agency 52



## Why Drive Trace Requirements ?

- Lab to Lab correlation
  - FE retests more common
- GHG
  - Driving technique could significantly impact compliance
  - IUVP
- Fuel economy label
  - Hypersensitivity to FE claims
    - Consumers
    - OEMs
    - Media
  - Along with General Label liberties, driver technique may be largest offset between lab and "real world" FE
- New technologies are more variable with driver input

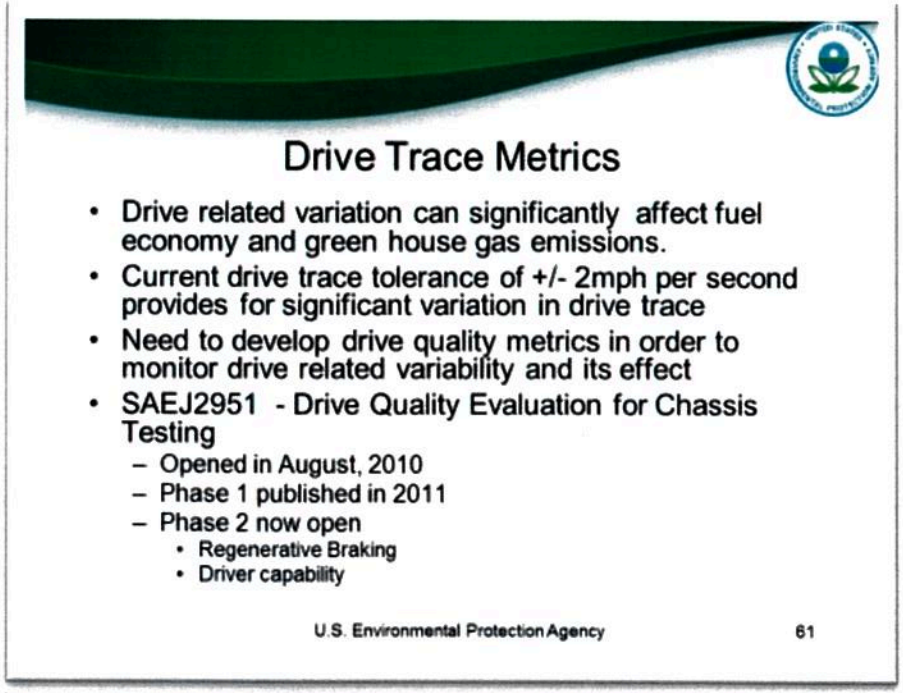
U.S. Environmental Protection Agency 54

# MAY 2013 EPA/INDUSTRY LIGHT-DUTY VEHICLE COMPLIANCE MEETING

EPA presentation and discussion:

- Introduced Drive Trace Metrics developed through SAE Standards

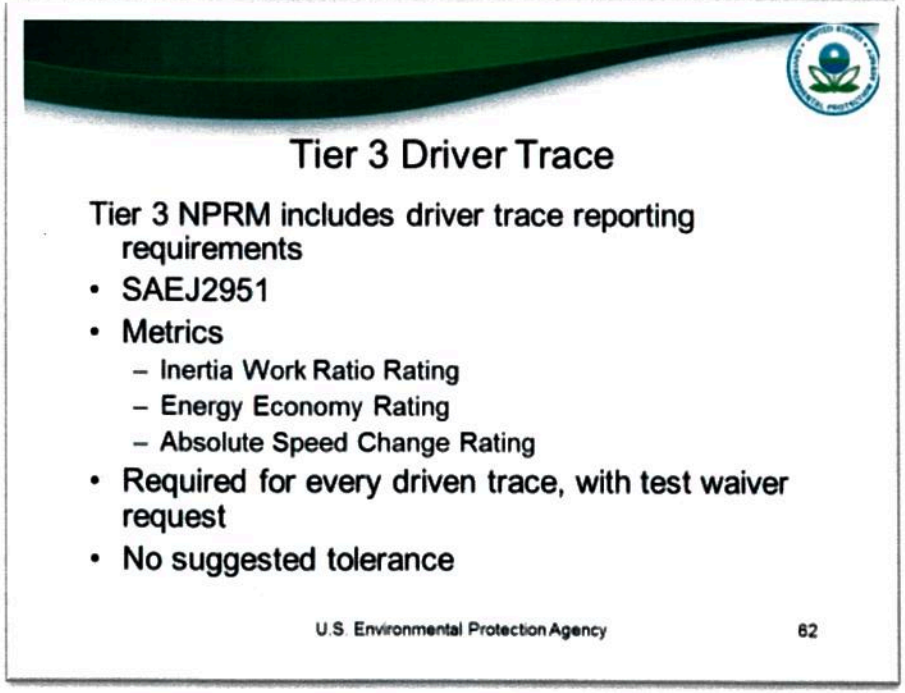
- Announced Driver Trace reporting requirements beginning with 2015 MY Data Vehicles



## Drive Trace Metrics

- Drive related variation can significantly affect fuel economy and green house gas emissions.
- Current drive trace tolerance of +/- 2mph per second provides for significant variation in drive trace
- Need to develop drive quality metrics in order to monitor drive related variability and its effect
- SAEJ2951 - Drive Quality Evaluation for Chassis Testing
  - Opened in August, 2010
  - Phase 1 published in 2011
  - Phase 2 now open
    - Regenerative Braking
    - Driver capability

U.S. Environmental Protection Agency 61



## Tier 3 Driver Trace

Tier 3 NPRM includes driver trace reporting requirements

- SAEJ2951
- Metrics
  - Inertia Work Ratio Rating
  - Energy Economy Rating
  - Absolute Speed Change Rating
- Required for every driven trace, with test waiver request
- No suggested tolerance

U.S. Environmental Protection Agency 62

# DRIVE CYCLE METRICS
## 2009 MY FEDV vs 2016 MY EDV

Official 2009 MY testing occurred in 2008 CY

- Emission Data Vehicle (EDV): Feb-March 2008
- Fuel Economy Data Vehicle (FEDV): June 2008
- prior to SAE J2951
  (GM has limited experience interpreting SAE J2951 metrics)
- Unable to retrieve 2009 MY speed traces from
  test site IT system (beyond record retention period)
- "Reference Copy" of the speed trace downloaded
  at time of testing. Processed offline using SAE J2951.

Official 2016 MY testing occurred in 2015 CY

- Emission Data Vehicle (EDV): Jan-Feb 2015
- No separate Fuel Economy Data Vehicle (FEDV)
- Drive Cycle Metrics generated by test site IT system
  as part of official test data
  - submitted in EPA's Verify information system

# DRIVE CYCLE METRICS
# 2009MY FEDV vs 2016MY EDV

| | City | | | Highway | | |
|---|---|---|---|---|---|---|
| | EER | ASCR | IWR | EER | ASCR | IWR |
| 2009 FEDV | -3.576 | -4.474 | -6.802 | -2.645 | -19.865 | -24.175 |
| 2016 EDV | -0.823 | -1.114 | -1.475 | -0.645 | 5.981 | 7.134 |

Drive Cycle Metrics:

**EER** – Energy Economy Rating
- Indicates energy consumption and distance travelled

**ASCR** – Absolute Speed Change Rating
- Indicates extent of velocity variation

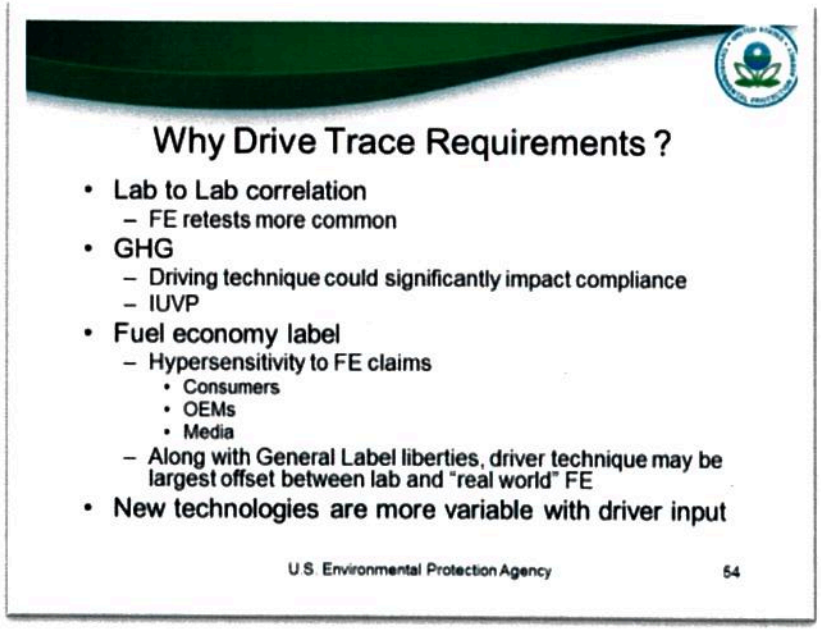
**IWR** – Inertia Work Rating
- Indicates inertia work

All ratings are % difference of drive from trace

# DRIVE CYCLE METRICS
# 2009MY FEDV vs 2016MY EDV

| | City | | | Highway | | |
|---|---|---|---|---|---|---|
| | EER | ASCR | IWR | EER | ASCR | IWR |
| 2009 FEDV | -3.576 | -4.474 | -6.802 | -2.645 | -19.865 | -24.175 |
| 2016 EDV | -0.823 | -1.114 | -1.475 | -0.645 | 5.981 | 7.134 |

Differences in FE test results between 2009 MY FEDV and 2016 MY EDV are consistent with implementation of EPA Guidance from 2013 Compliance Meeting, as indicated by Drive Cycle Metrics



# EPA REQUEST

Investigate reason for differences in fuel consumption of 2009 Data Vehicle and 2016 Data vehicle

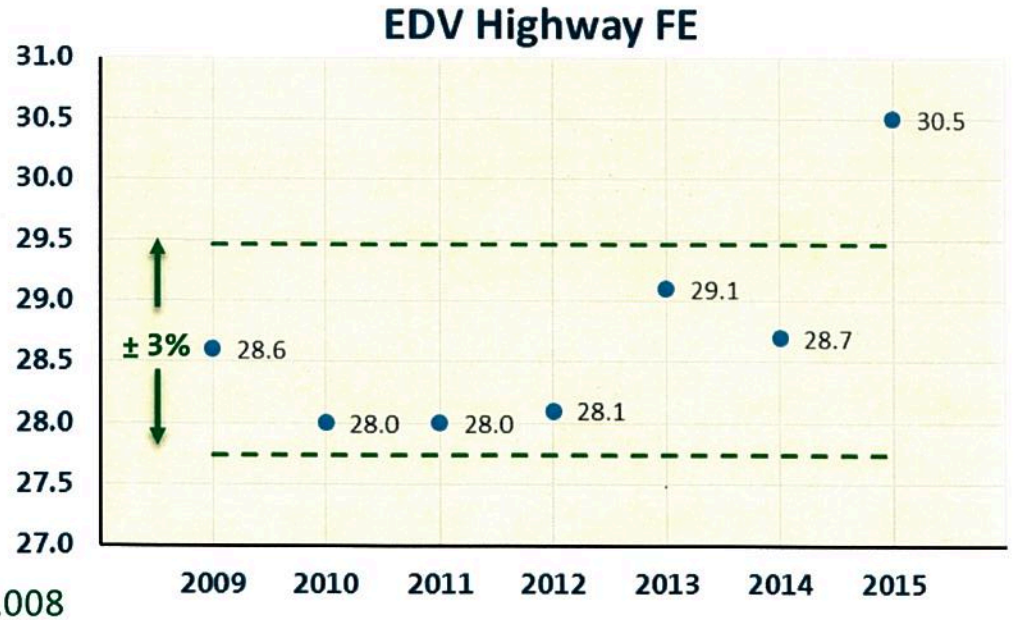
- 
- 

- Year-by-year comparison of City and Hwy "FE Equivalence"
- 

# FE EQUIVALENCE ASSESSMENT

Development data provided to support annual compliance statements

- Tests conducted each MY to confirm emission compliance
  - conducted at EDV test weight and RLHP
- Evaluation of FE results for those tests demonstrates FE Equivalence


± 3% ref. 600.008

# EPA REQUEST

Investigate reason for differences in fuel consumption of 2009 Data Vehicle and 2016 Data vehicle

- 
- 
- 
- Year-by-year summary of Running Changes

# CARRYOVER OF PRIOR MY DATA AND RUNNING CHANGES

Prior MY data "carryover" and Running Changes implemented according to Advisory Circular A/C No. 17F dated Nov. 16, 1982, amended Jan. 21, 1988

- Carryover of prior MY DDV and EDV data documented by individual letter to EPA
- Each Running Change documented by individual letter to EPA, and referenced in Final MY Certification Documentation update

Typical Running Changes:

- ECM / TCM calibration revisions to address
  - Assembly plant issues
  - Diagnostics calibrations
  - Driveability issues
- Optional emission-related hardware (e.g. alternate supplier for O2 sensor)
- Optional tire
- Vehicle controls & displays (fan control; Oil Life Monitor)

Appendix includes references to all 2009-2015 MY Running Change Letters

# CARRYOVER OF PRIOR MY DATA AND RUNNING CHANGES

Typical Carryover rationale:

has the same worst-case vehicle selection, identical catalytic converters, and no changes were made to the engine calibrations that would significantly affect emissions or catalytic converter temperatures

Sample of typical Running Changes:

- delay closed loop operation during green engine starts for improved vehicle performance at the vehicle assembly plant
- revise the engine fan control so that the fans turn off when the engine is keyed off.
- Lower RPM threshold to disable generator to address headlamps dimming at idle during hill hold.
- Revised cam shaft diagnostic calibrations for improved diagnostic performance.
- Increase gear dependent roll idle with brake off to improve tip in response below 1500 RPM's.
- new diagnostic parameters for diagnostic codes P0128 (Engine Coolant Temperature Sensor) and P0420 (Catalyst System Performance) for improved diagnostic performance.
- Set abort calibrations for PD to PDS back to false for the 6-5 and 5-4 shifts to prevent 6-4 and 5-3 PDS shifts
- revise the predictive throttle to be less aggressive, also changes were made for improved shift quality through all gear ranges
- Added Optional Sensor Asm-Htd Oxy P/N's: parts are virtually identical and functionally equivalent to the original oxygen sensors with only minor revisions to the wiring connectors

# REASON FOR DIFFERENCES IN FUEL CONSUMPTION OF 2009 DATA VEHICLE AND 2016 DATA VEHICLE

EDV and FEDV tests for all Model Years were executed according to drive trace metrics and validation criteria in effect at the time testing was conducted

EPA May 2013 workshop recognized "Some regulations, procedures, policy and guidance are dated and need to be updated" ... especially those related to drive trace requirements

EPA introduced Driver Trace reporting requirements beginning with 2015 MY Data Vehicles

Drive Cycle metrics for 2009 FEDV and 2016 MY EDV indicate primary reason for difference in FE test results

# RESPONSE TO NHTSA QUESTIONS RECEIVED MAY 19, 2016

Seeking information regarding discovery, root cause, applicability, and actions taken to resolve the error

# NHTSA QUESTIONS

1. When and how exactly did GM become aware that some of its MY 2016 fuel economy labels were providing inaccurate fuel economy values?
2. What is the cause of the discrepancy (i.e., reporting errors or testing)? Please explain in detail.
3. What model years and vehicle models do the discrepancies impact, more specifically do the discrepancies affect any model years other than 2016 for the aforementioned vehicles, or any other vehicle? Please provide all MYs and vehicle models impacted.
4. How did GM confirm that the discrepancies have no other impacts on other makes and models included in GM's CAFE fleets?
5. Does this discrepancy have any impact on the final CAFE performance results GM reported to EPA and NHTSA, that were used for determining compliance with NHTSA's CAFE program?
6. What actions has GM taken to resolve the identified issue?

# NHTSA QUESTIONS

1. When and how exactly did GM become aware that some of its MY 2016 fuel economy labels were providing inaccurate fuel economy values?

- New emissions-related hardware (catalytic converter loading) for these 2016 MY vehicles required new emission certification testing. The fuel economy data from these tests were not captured in calculations made for fuel economy labels for the 2016 MY vehicles, causing 2016 MY fuel economy values to be incorrect.
  - EDV tests conducted Jan-Feb 2015
  - official data and applications submitted to EPA April-May 2015
  - EPA Certificate of Conformity and FE values approved May 2015
- This error was discovered as GM engineers worked on 2017 MY FE labels, using carryover test results from 2016 MY. Preliminary 2017 MY FE label calculations yielded different values than those from 2016 MY.
  - Preliminary 2017 MY FE label calculations April 12, 2016
  - Preliminary determination of calculation error on 2016 MY April 14, 2016

# NHTSA QUESTIONS

2. What is the cause of the discrepancy (i.e., reporting errors or testing)? Please explain in detail.

- Our investigation indicates the error was due to use of an optional sequence for processing official FE tests in our IT system. The sequencing of our testing and identification of data to be included in FE calculations resulted in these EDV test results being inadvertently omitted from the "data pool" for FE label calculation.
  - IT System screen examples on following pages
- IT system changes implemented on May 17, 2016 eliminated optional methods to identify test results to be included in data pools: "FE Official" flag can now be set through a single method only

(b)( 4) CBI

[redacted]

(b)( 4) CBI

[redacted]

# NHTSA QUESTIONS

3. What model years and vehicle models do the discrepancies impact, more specifically do the discrepancies affect any model years other than 2016 for the aforementioned vehicles, or any other vehicle? Please provide all MYs and vehicle models impacted

- We believe this error only impacts 2016 MY:
  - Chevrolet Traverse
  - Buick Enclave
  - GMC Acadia
- FE values for 2014 and 2015 MYs of these vehicles were calculated using the "standard" sequencing to identify vehicle tests to be included in the Data Pools
- FE values for 2013 and earlier MYs of these vehicles were calculated prior to the IT system change which enabled this error

# NHTSA QUESTIONS

4. How did GM confirm that the discrepancies have no other impacts on other makes and models included in GM's CAFE fleets?

- The capability to optionally select "FE Official" flag on the "Search Results" screen was not available prior to Sept. 2013. No 2013 MY or earlier vehicles could have been impacted by this error.
- GM has manually reviewed and confirmed that all "data pools" created for all 2016 MY vehicles included test results from all applicable EDVs and FEDVs

# NHTSA QUESTIONS

5. Does this discrepancy have any impact on the final CAFE performance results GM reported to EPA and NHTSA, that were used for determining compliance with NHTSA's CAFE program?

- This error does not have any impact on GM's final CAFE reports
- This error only impacts 2016 MY vehicles (Chevrolet Traverse, Buick Enclave, and GMC Acadia)
- GM became aware of this error after submitting the "2016 pre-MY" CAFE report to NHTSA
- Corrected values will be included in the "2016 mid-MY" and "2016 Final" CAFE reports which have not yet been prepared
  - "2016 mid-MY CAFE" report due to NHTSA in July 2016

# NHTSA QUESTIONS

## 6. What actions has GM taken to resolve the identified issue?

- GM began investigating immediately when preliminary 2017 MY FE label calculations were performed which yielded different values than those from 2016 MY.
- April 18, 2016 submission to GM's Safety and Field Investigation (SFI) process initiated formal internal investigation
- SFI decision on May 11, 2016 resulted in immediate "Stop Delivery" order to dealers for all unsold vehicles
- Replacement Monroney Labels for unsold and sold vehicles
  - Shipments to dealers began Fri. May 13; shipments completed Tues. May 17
  - Delivery to existing customers to begin early June
- Customer Compensation Program announced Fri. May 20

# NHTSA QUESTIONS (Response 6 cont.)

## CUSTOMER COMPENSATION PROGRAM

Preliminary Approval May 13; Final Approval May 16

Communication to GM Field Sales Organization May 20 1:00 pm EDT; Release to media May 20 1:30 pm EDT

Customer letters will be sent via FedEx starting May 25

Guidelines:

- Same parameters as 2016 MY FE Label fuel cost calculations
  - 15,000 miles per year
  - $3.00 / gallon
- Difference between initial and corrected "fuel cost over 5 years"
- Purchase customers will be offered choice of pre-paid debit card OR 48-month/60,000-mile protection plan (extended warranty beyond base coverage)
- Lease customer: 5 year value pro-rated for Actual lease term
  - value for all leases calculated using 15k annual miles, regardless of term of lease
  - Round payment up to nearest $25 increment, where applicable

# NHTSA QUESTIONS (Response 6 cont.)

## CUSTOMER COMPENSATION PROGRAM

| Sale Type | Drivetrain | 24 Month Per Unit | 27 Month Per Unit | 36 Month Per Unit | 39 Month Per Unit | 42 Month Per Unit | 48 Month Per Unit | 60 Month Per Unit |
|---|---|---|---|---|---|---|---|---|
| Purchase | FWD - All | | | | | | | $750 |
| Purchase | AWD -Trav/Acad | | | | | | | $1,500 |
| Purchase | AWD -Encl | | | | | | | $750 |
| Lease | FWD - All | $300 | $350 | $450 | $500 | $525 | $600 | |
| Lease | AWD -Trav/Acad | $600 | $675 | $900 | $975 | $1,050 | $1,200 | |
| Lease | AWD -Enclav | $300 | $350 | $450 | $500 | $525 | $600 | |

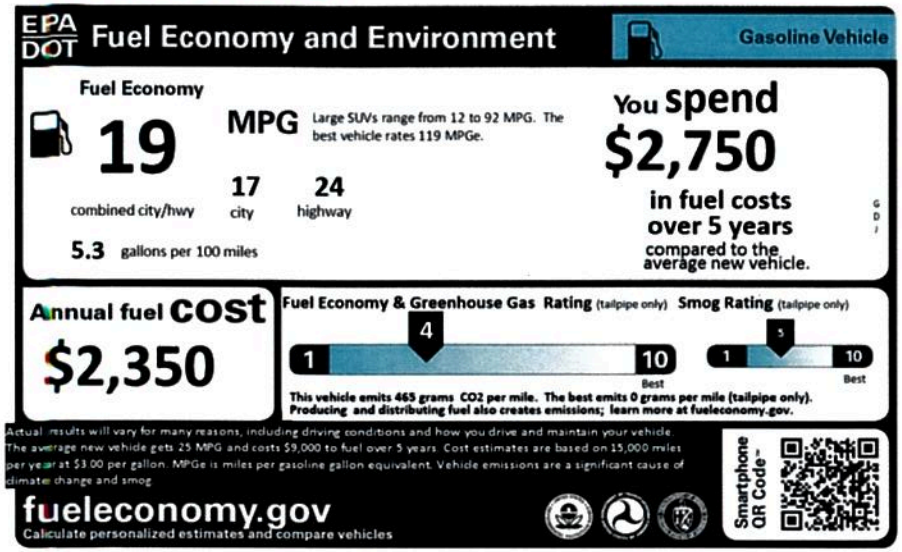
NOTE: original Enclave AWD label values were voluntarily reduced
by 1 mpg on highway and combined (16/22/18 instead of 16/23/19).
(Enclave AWD approx. 250 lb. heavier than other models)
Enclave AWD corrected label is same as other Traverse and Acadia AWD models

# APPENDIX

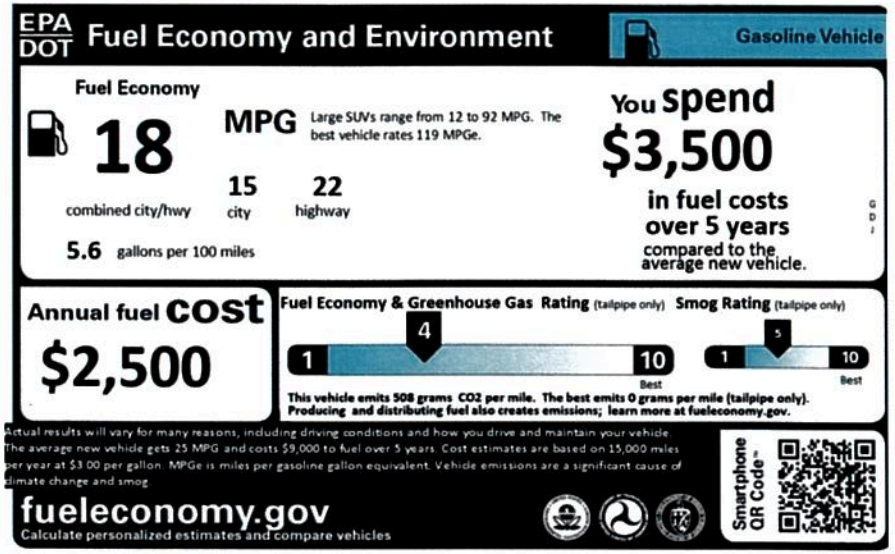
# FUEL ECONOMY LABEL ERROR

## 2016 MY Chevrolet Traverse, Buick Enclave, GMC Acadia

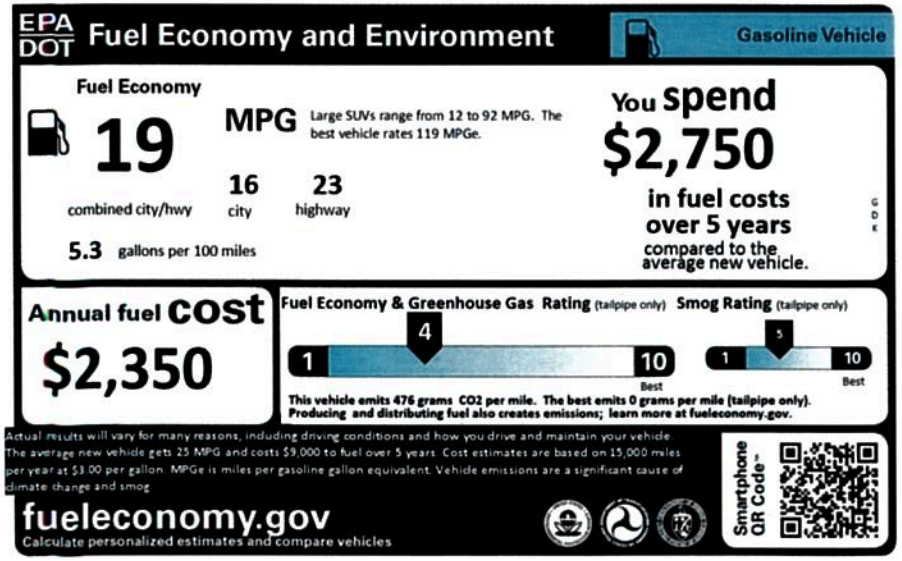
### Incorrect Label 2016 MY Traverse FWD



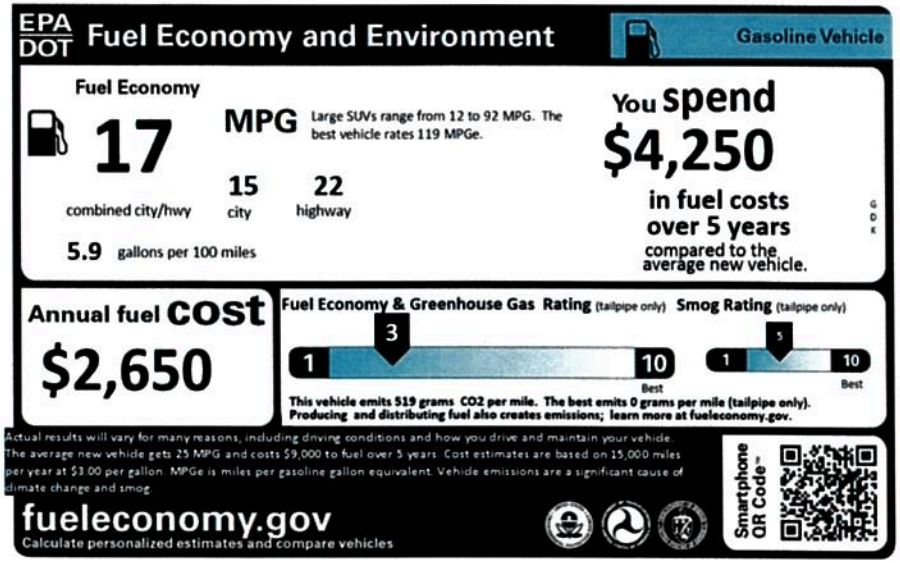

### Corrected Label 2016 MY Traverse FWD




### Incorrect Label 2016 MY Traverse AWD




### Corrected Label 2016 MY Traverse AWD



**From:** Bunker, Byron [mailto:bunker.byron@epa.gov]
**Sent:** Friday, May 13, 2016 2:53 PM
**To:** David P. Garrett <david.p.garrett@gm.com>; Wehrly, Linc <wehrly.linc@epa.gov>
**Cc:** Barbara Kiss <barbara.kiss@gm.com>; Wright, DavidA <Wright.DavidA@epa.gov>
**Subject:** RE: Stop Delivery Order - GM Reference # 43700

Dave,
Thank you for the update.

We would like General Motors to investigate and inform us of your findings regarding the reasons for the significant difference in fuel consumption for the 2009 EDV with these Original Test Vehicle Parameters:

ETW = 5500
RLHP = 18.9
N/V = 26.2

With the 2016 EDV results with these New Test Vehicle Parameters:

ETW = 5500
RLHP = 18.4
N/V = 26.0

Our intuition is that the 2016 vehicle should have lower fuel consumption than the 2009, but we understand your test results show the 2009 with approximately 10 percent lower fuel consumption. You should look into any effects that you believe relevant but at minimum, we would like GM at minimum to investigate the potential impact of the integrated work over the drive cycle (i.e., drive cycle metrics).

Please let me know if we need to make a more formal request for GM to respond.

Thanks,
Byron

**********
Byron Bunker
Director Compliance Division
Office of Transportation and Air Quality
Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, MI 48105
Bunker.Byron@epa.gov
Phone: (734) 214-4155
Mobile: (734) 353-9623
**********

**From:** Finneran, John (NHTSA) [mailto:John.Finneran@dot.gov]
**Sent:** Thursday, May 19, 2016 3:17 PM
**To:** David P. Garrett <david.p.garrett@gm.com>
**Cc:** Barbara Kiss <barbara.kiss@gm.com>; Giuseppe, Jeffrey <Jeffrey.Giuseppe@dot.gov>; Hicks, Maurice (NHTSA) <Maurice.Hicks@dot.gov>; Kolodziej, Kerry (NHTSA) <Kerry.Kolodziej@dot.gov>; Tamm, James (NHTSA) <james.tamm@dot.gov>; Deborah A. Zielesch <deborah.a.zielesch@gm.com>; Wehrly, Linc (wehrly.linc@epa.gov) <wehrly.linc@epa.gov>
**Subject:** MY 2016 Fuel Economy Label Discrepancies

David,
We recently became aware of the discrepancies with the fuel economy labels for the 2016 Chevy Traverse, GMC Arcadia, and Buick Enclave. We would like to find out more information on the issue. More specifically, we have the following questions:

1. When and how exactly did GM become aware that some of its MY 2016 fuel economy labels were providing inaccurate fuel economy values?
2. What is the cause of the discrepancy (i.e., reporting errors or testing)? Please explain in detail.
3. What model years and vehicle models do the discrepancies impact, more specifically do the discrepancies affect any model years other than 2016 for the aforementioned vehicles, or any other vehicle? Please provide all MYs and vehicle models impacted.
4. How did GM confirm that the discrepancies have no other impacts on other makes and models included in GM's CAFE fleets?
5. Does this discrepancy have any impact on the final CAFE performance results GM reported to EPA and NHTSA, that were used for determining compliance with NHTSA's CAFE program?
6. What actions has GM taken to resolve the identified issue?

As you are aware, the Energy Independence Security Act (EISA) provides authority to both NHTSA and EPA to regulate new fuel economy labels in 49 USC 32908(b) and 49 USC 32908(g)(1)(A). NHTSA codified the requirements for FE labels in 49 CFR 575.401. We are copying EPA's light-duty compliance group on this email and will ensure that the agencies collaborate on any follow-up actions. A response is due back to our office by May 27, 2016. If you have any concerns with any of the questions above, please contact Maurice Hicks of my staff at (202)366-1708. Finally, in the future, if GM identifies other CAFE or FE labeling violations, please be sure to contact both NHTSA and EPA as soon as the issue is identified.

Please confirm receipt of this email.

Regards,

John Finneran
Chief, Crash Avoidance Division
Office of Vehicle Safety Compliance
National Highway Traffic Safety Administration

| Running Change Letter Number | | Evaluation Method | Brief Description |
|---|---|---|---|
| 2009 MY | | | |
| ML-9R106 | Revised ECM/TCM, creating EC 33A. | Dev & Fuel economy testing | These new calibrations revise the shift pattern as well as the torque converter clutch apply and release points. |
| ML-9R110 | Revised ECM, creating EC's 31A and 33B. | Good engineering judgment | This new calibration delays closed loop operation during green engine starts for improved vehicle performance at the vehicle assembly plant |
| ML-9R111 | Revised ECM, creating EC's 31B and 33C. | Good engineering judgment | These new calibrations revise the engine fan control so that the fans turn off when the engine is keyed off. |
| ML-9R113 | Revised ECM, creating EC's 31C and 33D. | Good engineering judgment | Leaner green engine start calibrations for improved vehicle performance during assembly plant dynamic vehicle testing.<br>Lower RPM threshold to disable generator to address headlamps dimming at idle during hill hold.<br>Revised cam shaft diagnostic calibrations for improved diagnostic performance.<br><br>Increase gear dependent roll idle with brake off to improve tip in response below 1500 RPM's. |
| ML-9R134 | Added Bridgestone P255/55R20 tire and RLHP to Buick Enclave and GMC Acadia models. | Good engineering judgment | This update did not create a new worst case vehicle configuration. |
| ML-9R136 | Revised ECM, creating EC's 31D and 33E. | Dev testing | Leaner green engine start calibrations for improved vehicle performance during assembly plant dynamic vehicle testing.<br>Lower RPM threshold to disable generator to address headlamps dimming at idle during hill hold.<br>Revised cam shaft diagnostic calibrations for improved diagnostic performance.<br><br>Increase gear dependent roll idle with brake off to improve tip in response below 1500 RPM's. |
| ML-9R141 | Revised ECM, creating EC's 31E and 33F. | Good engineering judgment | These new calibrations include new diagnostic parameters for diagnostic codes P0128 (Engine Coolant Temperature Sensor) and P0420 (Catalyst System Performance) for improved diagnostic performance. |
| 9P194 | Update – Add Optional TCM Trans Cal P/N's ML-9R110 | Good engineering judgment | These new calibration set set the abort calibrations for PD to PDS back to false for the 6-5 and 5-4 shifts to prevent 6-4 and 5-3 PDS shifts |
| 9P216 | Update – Add Optional TCM Trans Caln P/N's ML-9R134 | Good engineering judgment | These new calibrations revise the predictive throttle to be less aggressive, also changes were made for improved shift quality through all gear ranges |
| 9P227 | Update – Added Optional Sensor Asm-Htd Oxy P/N's | Good engineering judgment | These new parts are virtually identical and functionally equivalent to the original oxygen sensors with only minor revisions to the wiring connectors |

| Running Change Letter Number | | Evaluation Method | Brief Description |
|---|---|---|---|
| **2010 MY** | | | |
| ML-AR063 | Added new ECM, creating EC's 31A and 33A | Good engineering judgment | Disabled diagnostic P0690, Main Relay.<br>Diagnostic P0562 (System Low Voltage) was revised to be enabled with engine run only.<br>Cruise control disabled debounce time due to traction event set to 400 ms.<br>Cruise control revised to prevent transmission from defaulting to limp home mode during coast brake mode.<br>Set Hill Hold calibration to 600 rpm. |
| ML-AR065 | Added new ECM, creating EC's 31B and 33B | Good engineering judgment | Revised the immobilizer calibration specifications to prevent a possible crank/no start situation.<br>Changed cam shaft calibrations to align with new engine hardware. |
| ML-AR068 | Added new ECM, creating EC's 60B and 61B, added new tire construction and RLHP for a Michelin P255/60R19 equipped on models 4R14526 and 4VR14526 | Development data | Revised spark gradients at high loads for improved performance.<br>Improved torque control during manual gear shifts for improved feel.<br>Refinements to oxygen sensor diagnostics for improved diagnostic performance.<br>Disabled P0690 (Engine Controls Ignition Relay Feedback Circuit High Voltage).<br>Refined cam/crank synchronization for improved starting consistency.<br>Revised fuel level threshold for tank pressure sensor diagnostic for improved diagnostic performance. |
| ML-AR074 | Added new TCM, creating EC's 32 and 34. | Development data | Revised the 2 -3 light throttle calibration for improved shift feel.<br>Increased the Torque Converter Clutch (TCC) coast ramp rate to allow for higher TCC pressure.<br>Revised shift pattern for improved vehicle driveability and customer satisfaction. |
| Update Letter Number | | | |
| AP129 | Update – Added Optional TCM-Trans Caln & Diagn P/N's ML-AR065 | Good engineering judgment | Revised calibrations for a speed sensor drop out issue in TUTD mode to prevent a first gear commanded at high speeds, and to ensure proper diagnostic performance<br>Improved TCCC control in coast mode for 5th and 6th gears. |
| AP135 | Update – Add Optional TCM Trans Caln P/N's ML-AR074 | Good engineering judgment | Revised the 2 -3 light throttle calibration for improved shift feel.<br>Increased the Torque Converter Clutch (TCC) coast ramp rate to allow for higher TCC pressure.<br>Revised calibration to correct speed error in cruise control for vehicles with 17" tires. |
| AP156 | Update – Add Optional Parts | Good engineering judgment | Improved adaptation and shift stability.<br>Modified P0716 vehicle speed threshold and a timer for improved diagnostic performance.<br>Made P3 shift calibrations align more closely with P5 shift calibrations at altitude |

| Running Change Letter Number | | Evaluation Method | Brief Description |
|---|---|---|---|
| **2011 MY** | | | |
| ML-BR028 | Added new O2 sensor; added new ECM, creating EC's 31A, 32A, 33A and 34A. | Development data | This running change adds an optional oxygen sensor with added element coating which increases the water shock cracking temperature. Furthermore a new ECM calibration part number was added with revised upstream fuel biasing calibration changes driven by the new sensor |
| ML-BR034 | creating engine codes 29A, 30A, 48A, 84A, 85B, 86B, 87A and 88A | Good engineering judgment | Revised camshaft one tooth off diagnostic to accommodate timing chain variation.<br>Minimized manual transmission torque intervention for 0.5 seconds after gear shift for improved shift feel.<br>Adjusted gear detection for the manual transmission with the 3.73 final drive ratio for improved vehicle performance |
| ML-BR065 | Additional optional part numbers were added to engine codes 60B and 61B | Good engineering judgment | Changed interval when Oil Life Change message is displayed |
| ML-BR094 | Added new optional ECM, updating EC's 29A, 30A, 31A, 32A, 33A, 34A, and 48A. | Good engineering judgment | Modified the misfire monitor to prevent false MIL's (Malfunction Indicator Light). |
| Updates Letter Number | | | |
| BP112 | Update – Add Optional Parts ML-BR034 | Good engineering judgment | These new calibrations changed the cal out method for the N1, R1, NR, and DR oncoming pressure adapts to lower values to avoid the effect of EOL trying to update to a shift pressure value which rolls over the signed bit, causing a negative adapt |
| BP140 | Update – Oil Life Monitor ML-BR065 | Good engineering judgment | These new calibrations changed the oil life monitoring warning message to display after 5,000 miles. |

| Running Change Letter Number | | Evaluation Method | Brief Description |
|---|---|---|---|
| **2012 MY** | | | |
| ML-CR011 | Revised ECM/TCM, creating EC's 31A, 32A, 33A | Development data | Removed auto green assembly plant fuel pump prime feature.<br>· Corrected axle torque arbitration issue with traction control causing TCM diff score cycling.<br>· Corrected software error, key-off event during cranking resets Engine Mode Not Run Timer.<br>· Corrected GMLAN Engine Specific humidity Mask and Validity signals in frame $3FC.<br>· Modified Speed Control calibrations to correct Green Engine stalls with Power Steering cramps.<br>· Modified Speed Control calibrations to improve Cold Engine Idle Stability.<br>· Modified SP Chokes at Cold Temperatures (< -16C) to improve Cold Engine Idle Stability.<br>· Modified Phase Idle Torque Limits to improve Idle Stability.<br>· Modified CSEC DP-to-SP Spark calibration to improve Drive Quality.<br>· Modified O-Ring protection exit ramp to improve Drive Quality.<br>· Modified Torque Shaping calibrations to improve Drive Quality.<br>· Modified Degrade O2 Sensor Closed Loop Fueling to improve ESPD robustness.<br>· Incorporated Torque PDT BTM robustness changes<br>· Incorporated Cruise Switch Diagnostic robustness change.<br>· Incorporated Speed Control and Torque PDT best practice changes.<br>· Incorporated HFV6 Truck SPDR, DTRR, DFCO, FCLP, OLM, Torque Safety Commonization changes.<br>· Modified CATD diagnostic calibrations to improve robustness.<br>· Modified ECTD diagnostic calibrations to improve robustness.<br>· Modified ESPD and POPD diagnostic calibrations to improve robustness.<br>· Modified FASD and FAPD diagnostic calibrations to improve robustness.<br>· Modified Misfire diagnostic calibrations to improve robustness.<br>· Modified Brake Pedal Position Sensor diagnostic calibrations to improve robustness.<br>· Modified IAT2 Sensor diagnostic calibrations to improve robustness.<br>· Modified Spark EST diagnostic calibrations to improve robustness.<br>· Incorporated Diagnostic PDT change to support IAT2 PID.<br>· Incorporated ECTR, HSCR and THMR Master Calibration best practice changes |

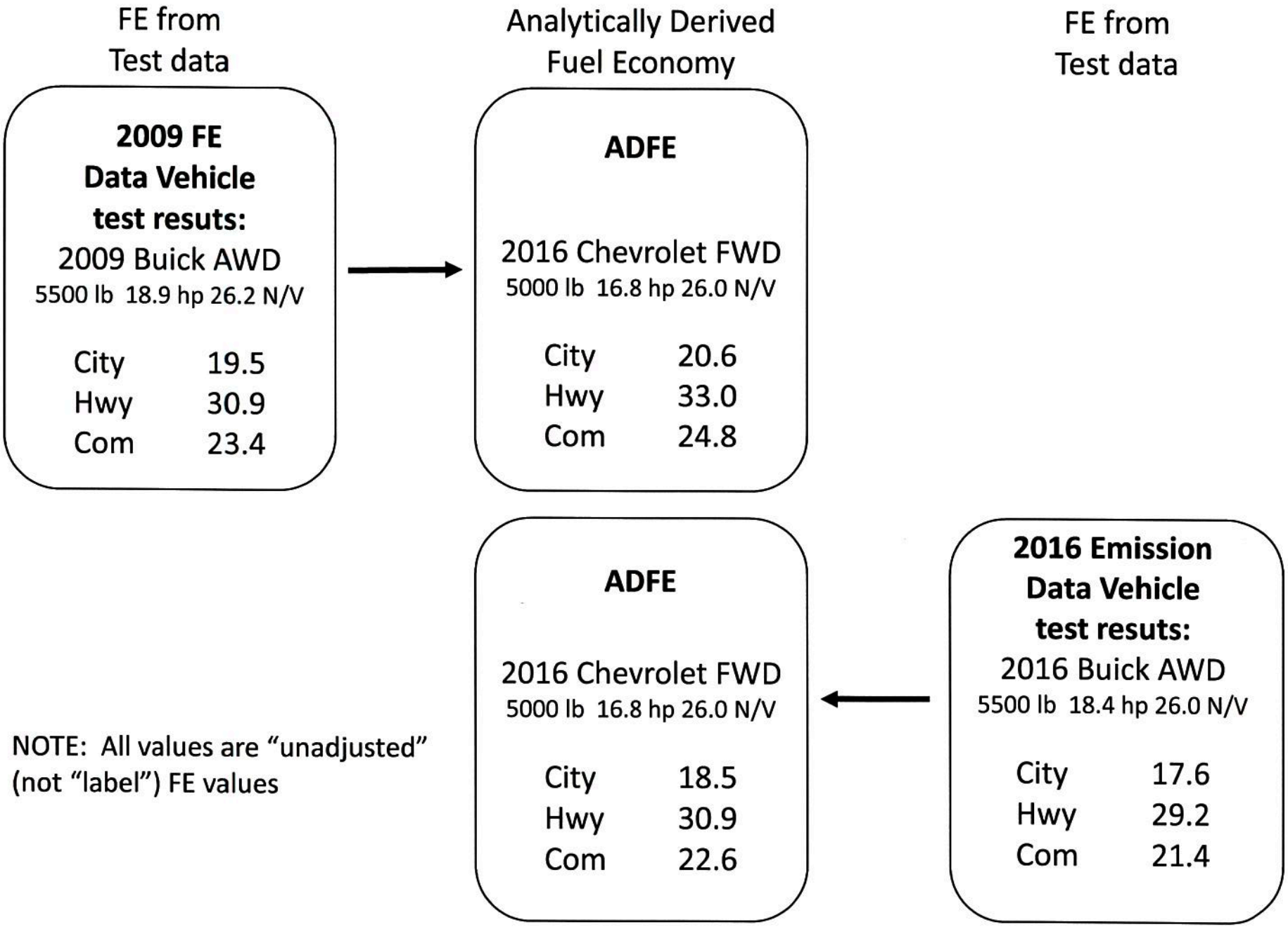
| Running Change Letter Number | | Evaluation Method | Brief Description |
|---|---|---|---|
| **2012 MY cont.** | | | |
| ML-CR012 | Revised ECM/TCM, creating EC's 31B and 33B. | Development data | Corrected IAT2 PID68 for compliance on applications with humidity sensor.<br>· Added Engine Oil Temp Display - use modeled oil temp for display when a sensor is not available<br>· Modified Fuel Injector Flow Rate to improve LTM robustness.<br>· Modified Starter Control calibrations to improve Bump Start robustness.<br>· Modified DFCO calibrations to improve Drive Quality.<br>· Modified Torque Shaping calibrations to improve Drive Quality.<br>· Modified Fuel Pump RVC Min Setpoint calibration to prevent potential Battery drain.<br>· Moved some negative spark from Phaser Spark to Base Spark to limit Phaser Spark to -10deg.<br>· Modified DP Min Spark to improve RPM Cold Start Flare robustness.<br>· Modified Default Humidity calibration to improve Cold Start RPM Flare robustness.<br>· Modified High Pressure Start Timeout calibration to improve DTC P00C6 robustness.<br>· Modified Diagnostic Fuel Level transfer function to improve diagnostic fuel level integrity.<br>· Modified Diagnostic Fuel Level filter coefficient to improve diagnostic fuel level integrity.<br>· Modified shift schedule for Buick/GMC FWD products for fuel efficiency improvement. |
| ML-CR020 | Revised ECM/TCM, creating EC's 31C and 33C. | Development data | Modified Idle Torque Reserve to improve Idle stability.<br>· Modified DFCO calibrations to improve drive quality. |
| ML-CR021 | Revised ECM/TCM, creating EC's 31D and 33D. | Development data | Modified DFCO calibrations to improve drive quality |
| ML-CR044 | Added new availability for Goodyear P255/65R18 ALS tire for models 4V14526 and 4R14526 | Good engineering judgment | This update will not create a new worst case vehicle configuration, so no new test data is required. |
| Update Letter Number | | | |
| CP108 | Update – Add Optional Parts | Good engineering judgment | General Motors submits the following optional part for engine codes 29, 30, 44, 48, 16A, 17A, 19A, 31D, 33D, 11B:<br>VALVE ASM-CONT SOL (W/ BODY & TCM) – P/N 24264114<br>General Motors also submits the following optional part for engine code 22:<br>VALVE ASM-CONT SOL (W/ BODY & TCM) – P/N 24264128<br>This new part number covers a TEHCM pressure switch module bracket change. |
| CP118 | Update – Add Optional TCM Software P/N | Good engineering judgment | On all T43 FWD and RWD 6-speed automatic transmission applications, added an optional TCM software part number (24264923). Minor changes were made to the software to improve diagnostic robustness. |
| CP132 | Update – Add Optional Converter Asm-Ctltc P/N | | General Motors submits the following optional part for engine codes 31D and 33D in test group CGMXT03.6151: CONVERTER ASM-CTLTC <SPLIT> – P/N 12636475. This previous part was mis-stamped; this part is functionally equivalent |

| Running Change Letter Number | | Evaluation Method | Brief Description |
|---|---|---|---|
| **2013 MY** | | | |
| ML-DR021 | Revised ECM/TCM, creating EC's 31A and 33A | Development data | ECM - Oil life monitor mileage limit changed from 9300 miles to 7500 miles.<br>TCM - Modified calibration to improve the vehicle's ability to adapt while coasting. The change improves slip control in the torque converter, which results in longer deceleration fuel cut off (DFCO) times. |
| Update Letter Number | | | |
| ML-DP116 | Update - optional parts for engine codes 31A and 33A | Good engineering judgment | Increase the speed at which the mode 2 valve exhausts torque converter clutch feed pressure. |
| | DATA FILE-TCM TRANS CALN | | Increase the cleaning cycle of the torque converter clutch variable feed solenoid to be more effective. |
| | DATA FILE-TCM TRANS DIAGN | | Modify current rationality diagnostic codes P0965, P2728, P2719 so they won't falsely set at ambient temperatures near 0°C with the vehicle in neutral. |
| ML-DP137 | DATA FILE-ECM VEH SYS CALN | Good engineering judgment | Update –clerical corrections for engine codes 31, 33, and all letter derivatives to remove extra part numbers |

| Running Change Letter Number | | Evaluation Method | Brief Description |
|---|---|---|---|
| **2014 MY** | | | |
| ML-ER011 | Added new TCM, creating EC's 35A and 36A. | Good engineering judgment | Enabled more deceleration fuel cutoff time for a positive fuel economy impact.<br><br>· Increased the speed at which the mode 2 valve exhausts torque converter clutch feed pressure.<br>· Increased the cleaning cycle of the torque converter clutch variable feed solenoid to be more effective.<br>· Modified current rationality diagnostic codes P0965, P2728 and P2719 so they won't falsely set at<br>ambient temperatures near 0°C with the vehicle in neutral. |
| | | Good engineering | · Modified the Base Adapts for improved drivability.<br>· Improved the following algorithms to improve shift feel: Quick Shift at Sync, Return to Previous<br>Range, Closed Throttle and Power on Downshift. |
| Update Letter Number | | | |
| EP110 | Update - optional part for engine codes 35A and 36A<br><br>DATA FILE-ECM FUEL SYS CALN | Good engineering judgment | Increases robustness of the fuel level sensor in the following situations: slow fuel slosh caused by slow speed maneuvers such as driving in a parking lot, refueling vehicle from approximately 7/8ths tank, reflashing ECM in the assembly plant |

| Running Change Letter Number | | Evaluation Method | Brief Description |
|---|---|---|---|
| **2015 MY** | | | |
| ML-FR013 | Decreased TWC of 4V14526 Buick Enclave AWD from 5500 to 5250 | Good engineering judgment | The dynamometer coefficients have also been changed accordingly. |
| ML-FR062 | Revised TCM, creating EC's 35A and 36A. | Good engineering judgment | Lowered the 1-2, 2-3, and 3-4 upshift points at mid-pedal to address customer complaints of delayed shifts<br>· Adjusted clutch actuator fill calibrations to improve 2-3 upshift feel<br>· Adjusted clutch pressure calibrations to improve light pedal 3-2 downshift feel<br>· Adjusted clutch pressure calibrations to improve 4-5 liftfoot upshift fee |
| Update Letter Number | | | |
| FP132 | Added Optional Part for EC's 35 and 36 | Good engineering judgment | CANISTER ASM-EVAP EMIS<br>The canister is functionally equivalent. It will not degrade evaporative emissions performance of the vehicle |


GENERAL MOTORS


FE from
Test data
2009 FE
Data Vehicle
test resuts:
2009 Buick AWD
5500 lb 18.9 hp 26.2 N/V
City 19.5
Hwy 30.9
Com 23.4
Analytically Derived
Fuel Economy
ADFE
2016 Chevrolet FWD
5000 lb 16.8 hp 26.0 N/V
City 20.6
Hwy 33.0
Com 24.8
FE from
Test data
2016 Emission
Data Vehicle
test resuts:
2016 Buick AWD
5500 lb 18.4 hp 26.0 N/V
City 17.6
Hwy 29.2
Com 21.4
ADFE
2016 Chevrolet FWD
5000 lb 16.8 hp 26.0 N/V
City 18.5
Hwy 30.9
Com 22.6
NOTE: All values are "unadjusted"
(not "label") FE values

**From:** David P. Garrett
**To:** John.Finneran@dot.gov; Maurice.Hicks@dot.gov
**Cc:** Wehrly, Linc; Bunker, Byron; Wright, DavidA; Peavyhouse, Robert; Good, David; Davis, Theresa
**Subject:** RE: GM SUV FE Labels
**Date:** Monday, May 23, 2016 2:01:16 PM

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I have set up a WebEx meeting and teleconference to enable NHTSA participants to join the discussion scheduled by EPA on Wednesday May 25, 2016 at 1:00 pm EDT.

During this meeting, we will respond to:

- EPA's Request from May 13, 2016 to investigate reasons for differences in fuel consumption of 2009 Data Vehicle and 2016 Data vehicle;
  and
- NHTSA Questions received May 19, 2016 seeking information regarding discovery, root cause, applicability, and actions taken to resolve the error

Please contact me if you have any questions regarding "logistics" for this meeting.

Best Regards,
Dave.

David P. Garrett
Director, Global Vehicle Emission Compliance
General Motors LLC

(b) (6) office
mobile
david.p.garrett@gm.com

Join WebEx meeting
Meeting number: (b) (6)
(b) (6)

Join by phone
Call-in toll-free number: (b) (6)
Call-in number: (b) (6)

Conference Code: (b) (6)

Can't join the meeting? Contact support.

-----Original Appointment-----
**From:** Wehrly, Linc [mailto:wehrly.linc@epa.gov]
**Sent:** Monday, May 23, 2016 8:45 AM
**To:** Wehrly, Linc; David P. Garrett; John.Finneran@dot.gov; Maurice.Hicks@dot.gov; Bunker, Byron; Wright, DavidA; Peavyhouse, Robert; Good, David; Davis, Theresa
**Subject:** GM SUV FE Labels
**When:** Wednesday, May 25, 2016 1:00 PM-2:00 PM (UTC-05:00) Eastern Time (US & Canada).
**Where:** AA-Room-Office-C35-ConfRoom/AA-OTAQ-OFFICE

GM will give EPA and NHTSA an overview of what happened with the incorrect FE labels for the Traverse/Acadia/Enclave SUVs and whether they have any impact on CAFÉ/GHG.

| | |
|---|---|
| **From:** | David P. Garrett |
| **To:** | Bunker, Byron |
| **Cc:** | Wehrly, Linc; John.Finneran@dot.gov; Hicks, Maurice (NHTSA); ahebert@arb.ca.gov |
| **Subject:** | RE: 2016 Fuel Economy Labels Compensation Program |
| **Date:** | Friday, May 20, 2016 4:58:48 PM |
| **Attachments:** | Lambda fuel economy labels Communications statement 2016-05-20.pdf |

The attachment to the email I sent this morning regarding our Compensation Program included "Privileged & Confidential" in the header of the document.
I have attached a version to this message contains identical text to the earlier letter ... which is not marked as privileged or confidential.
This statement was the basis for widespread media reports this afternoon.

Best Regards,
Dave.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) office
mobile
david.p.garrett@gm.com

**From:** David P. Garrett
**Sent:** Friday, May 20, 2016 10:31 AM
**To:** Bunker, Byron (bunker.byron@epa.gov) <bunker.byron@epa.gov>
**Cc:** Linc Wehrly - US EPA - Ann Arbor (wehrly.linc@epa.gov) <wehrly.linc@epa.gov>; 'John.Finneran@dot.gov' <John.Finneran@dot.gov>; Hicks, Maurice (NHTSA) <Maurice.Hicks@dot.gov>
**Subject:** 2016 Lambda Fuel Economy Labels Compensation Program
**Importance:** High

Byron –
As we discussed by telephone, attached is a statement and Q&A regarding a Compensation program for customers with 2016 Chevrolet Traverse, GMC Acadia, and Buick Enclave vehicles.
Communications to our Chevy, Buick, and GMC dealers is scheduled for 1:00 today, followed by announcement to media at 1:30.

Jim Cain (contact info below) is GM's lead spokesperson on this matter.

Best Regards,
Dave.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) [redacted] office
mobile
david.p.garrett@gm.com

**From:** James R Cain
**Sent:** Friday, May 20, 2016 8:35 AM

Attached please find the final approved statement and Q&A for today's 1:30 pm Lambda compensation announcement to media. Field call is 1 p.m.

Please let me know if you have questions.

Thanks,
Jim

James Cain
General Motors Company
Senior Manager
Chevrolet and Brand Business Communications
(b) (6) [redacted]

**From:** David P. Garrett
**Sent:** Wednesday, May 18, 2016 12:46 PM
**To:** Bunker, Byron (bunker.byron@epa.gov) <bunker.byron@epa.gov>
**Subject:** updated Holding Statement

Byron –
Attached is an updated Holding Statement with GM Communications will use with any media inquiries.
The updates are to better respond to some of the recent media questions and speculation.

Best Regards,
Dave.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) [redacted] office
mobile

david.p.garrett@gm.com

**2016 Lambda Fuel Economy Labels Compensation Program**
**Statement and Q&A**

FINAL 5-19-16

## Key Messages

- The customer is at the center of everything GM does
- GM made an inadvertent mistake and is taking positive steps to make things right

## Statement

"We want all of our customers to have a great ownership experience, so we designed this reimbursement program to provide full and fair compensation in a simple, flexible and timely manner."

## Q&A

**1. Why is compensation necessary?**

A. New emissions-related hardware in the 2016 Chevrolet Traverse, GMC Acadia and Buick Enclave required new emissions testing. That data was not captured in calculations made for EPA fuel economy labels and caused fuel economy numbers to be overstated by 1-2 miles per gallon. We are reimbursing customers who may pay more for fuel than they expected after viewing the incorrect window label when they purchased or leased the vehicle.

**2016 Lambda Fuel Economy Labels Compensation Program**
**Statement and Q&A**

FINAL 5-19-16

**2. What are the offers and how was the value determined?**

A. Purchase customers will be offered a choice between a pre-paid debit card and a 48-month/60,000-mile protection plan. The protection plan option is designed for high-mileage customers and those who plan to keep their vehicle for an extended period of time. Lease customers will be offered a pre-paid debit card. The weighted average value of the pre-paid debit cards will be $450-$900, Individual compensation may be more or less.

The reimbursement is based on the same assumptions used in the EPA formula on the window label to calculate expected future fuel costs: a fuel price of $3 per gallon and 15,000 miles of annual driving for five years.

**3. Who is eligible?**

A. Approximately 135,000 retail customers.

**4. What about fleet customers?**

A. Compensation discussions with fleet customers will be handled individually.

**5. Are customers in Canada included?**

A. Yes. There will be a similar program in Canada.

**6. How much will the program cost GM?**

A. We are not disclosing the cost of the program. It will not materially impact our financial results.

**2016 Lambda Fuel Economy Labels Compensation Program**
**Statement and Q&A**

FINAL 5-19-16

**7. Is GM requiring customers to sign a legal release?**

A. Yes. We put the customer first so we are providing reimbursement that fully compensates them for the impact of the error, so we feel a release is appropriate.

**8. When did GM decide to create a compensation program?**

A. Preliminary approval was on May 13. It was finally approved on May 16.

**9. When will dealers receive replacement fuel economy labels, and when will the stop sale be lifted?**

A. New labels have already been printed and shipped for the majority of vehicles. Once replacement labels have been affixed to the affected vehicles, dealers can deliver them to customers. Labels should be in dealers' hands for all the vehicles this week.

**10. Will this issue impact GM's May sales?**

A. We believe the impact, if any, will be minor.

**11. When and how will customers be notified of the program**

A. Customer letters will be sent via FedEx starting May 25.

**12. Is the compensation transferable?**

A. Yes.

# # #

| | |
|---|---|
| **From:** | David P. Garrett |
| **To:** | Bunker, Byron |
| **Cc:** | Wehrly, Linc; John.Finneran@dot.gov; Hicks, Maurice (NHTSA) |
| **Subject:** | 2016 Lambda Fuel Economy Labels Compensation Program |
| **Date:** | Friday, May 20, 2016 10:34:44 AM |
| **Attachments:** | 43700 Label Q A_2016-05-18.docx<br>Lambda fuel economy labels Communications statement_2016-05-20.docx |
| **Importance:** | High |

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Byron –

As we discussed by telephone, attached is a statement and Q&A regarding a Compensation program for customers with 2016 Chevrolet Traverse, GMC Acadia, and Buick Enclave vehicles. Communications to our Chevy, Buick, and GMC dealers is scheduled for 1:00 today, followed by announcement to media at 1:30.

Jim Cain (contact info below) is GM's lead spokesperson on this matter.

Best Regards,
Dave.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) office
mobile
david.p.garrett@gm.com

**From:** James R Cain
**Sent:** Friday, May 20, 2016 8:35 AM

Attached please find the final approved statement and Q&A for today's 1:30 pm Lambda compensation announcement to media. Field call is 1 p.m.

Please let me know if you have questions.

Thanks,
Jim

James Cain
General Motors Company
Senior Manager
Chevrolet and Brand Business Communications
(b) (6)

(b) (6) [redacted]

**From:** David P. Garrett
**Sent:** Wednesday, May 18, 2016 12:46 PM
**To:** Bunker, Byron (bunker.byron@epa.gov) <bunker.byron@epa.gov>
**Subject:** updated Holding Statement

Byron –
Attached is an updated Holding Statement with GM Communications will use with any media inquiries.
The updates are to better respond to some of the recent media questions and speculation.

Best Regards,
Dave.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) [redacted] office
mobile
david.p.garrett@gm.com

Q&A For 43700 - Fuel Economy Label Error
2016 Model Year Buick Enclave, Chevrolet Traverse, and GMC Acadia

MEDIA STATEMENT (Reactive only)
New emissions-related hardware in the 2016 Chevrolet Traverse, GMC Acadia and Buick Enclave, required new emissions testing for these vehicles. The fuel economy data from these tests were not captured in calculations made for EPA fuel economy labels for the 2016 model year Traverse, Acadia and Enclave (causing 2016 model year fuel economy numbers to be overstated). This error does not impact prior model year vehicles. Including these new data yields fuel economy results of 15/22/18 – FWD and 15/22/17 – AWD. This error was discovered as GM engineers worked on the 2017 model year labels, and was quickly reported to EPA. We continue to work with the EPA on this issue.

**What about vehicles from prior model years? How can you be certain you didn't overstate those numbers?**
As we said, the engineering change was for the 2016 model year Traverse, Acadia and Enclave, a population of approximately 240,000 vehicles. The new emission certification tests were required only for those vehicles.

**Which vehicles are involved?**
All 2016 model year Buick Enclave, Chevrolet Traverse, and GMC Acadia vehicles.

**Which label is involved?**
The Monroney window label that includes the fuel economy label and pricing information for the vehicle.

**What is the condition?**
An error was discovered on the fuel economy label on these vehicles. The error caused the EPA estimated fuel economy to be listed on the window label as 1-2 MPG higher than it should have been. Actual MPG will depend upon driving conditions and driver behavior. GM has informed the EPA about this condition.

**What are the corrected 2016 model year fuel economy values?**
The EPA approved estimated fuel economy values are as follows:
FWD: Combined City/Hwy 18 MPG, City 15 MPG, Highway 22 MPG
AWD: Combined City/Hwy 17 MPG, City 15 MPG, Highway 22 MPG
Detailed information will be provided on the corrected label.

**When will the corrected labels be provided?**
- EPA's fueleconomy.gov website was updated with the corrected values on Friday, May 13 a.m.
- GM has printed replacement labels for all unsold vehicles located at dealers. Chevrolet dealers began receiving replacement labels on Saturday May 14; replacement labels for unsold vehicles have been shipped to all US dealers (Chevrolet, Buick, GMC) as of Tuesday May 17
- Replacement labels for vehicles already in customer use will be sent to the owners' address of record

**How did GM discover this condition?**

The error was discovered as GM engineers worked on the 2017 model year label. They found that the 2016 model year label was calculated incorrectly.

**What about the sold vehicles with the error?**
GM will contact owners of the affected models to address this situation.

**Does this affect the safety or drivability of the vehicle?**
No. Customers can continue to operate their vehicle.

**Is it possible that the Enclave, Traverse, Acadia, and also the discontinued Saturn Outlook may have been incorrect for years?**
The 2016 MY mislabeling issue does not impact prior model years.

**Has EPA asked GM to document the reasons for the difference between the 2009 and 2016 results including the test cycle statistics.**
We will review our data with the EPA to address any questions they may have.

Updated 5/18/16 11:05 NPR

**2016 Lambda Fuel Economy Labels Compensation Program**
**Statement and Q&A**

FINAL 5-19-16

Privileged & Confidential

## Key Messages

- The customer is at the center of everything GM does
- GM made an inadvertent mistake and is taking positive steps to make things right

## Statement

"We want all of our customers to have a great ownership experience, so we designed this reimbursement program to provide full and fair compensation in a simple, flexible and timely manner."

## Q&A

**1. Why is compensation necessary?**

A. New emissions-related hardware in the 2016 Chevrolet Traverse, GMC Acadia and Buick Enclave required new emissions testing. That data was not captured in calculations made for EPA fuel economy labels and caused fuel economy numbers to be overstated by 1-2 miles per gallon. We are reimbursing customers who may pay more for fuel than they expected after viewing the incorrect window label when they purchased or leased the vehicle.

**2. What are the offers and how was the value determined?**

A. Purchase customers will be offered a choice between a pre-paid debit card and a 48-month/60,000-mile protection plan. The protection plan option is designed for high-mileage customers and those who plan to keep their vehicle for an extended period of time. Lease customers will be offered a pre-paid debit card. The weighted average value of the pre-paid debit cards will be $450-$900, Individual compensation may be more or less.

The reimbursement is based on the same assumptions used in the EPA formula on the window label to calculate expected future fuel costs: a fuel price of $3 per gallon and 15,000 miles of annual driving for five years.

**3. Who is eligible?**

A. Approximately 135,000 retail customers.

**4. What about fleet customers?**

A. Compensation discussions with fleet customers will be handled individually.

**5. Are customers in Canada included?**

A. Yes. There will be a similar program in Canada.

**6. How much will the program cost GM?**

A. We are not disclosing the cost of the program. It will not materially impact our financial results.

**2016 Lambda Fuel Economy Labels Compensation Program**
**Statement and Q&A**

FINAL 5-19-16

Privileged & Confidential

**7. Is GM requiring customers to sign a legal release?**

A. Yes. We put the customer first so we are providing reimbursement that fully compensates them for the impact of the error, so we feel a release is appropriate.

**8. When did GM decide to create a compensation program?**

A. Preliminary approval was on May 13. It was finally approved on May 16.

**9. When will dealers receive replacement fuel economy labels, and when will the stop sale be lifted?**

A. New labels have already been printed and shipped for the majority of vehicles. Once replacement labels have been affixed to the affected vehicles, dealers can deliver them to customers. Labels should be in dealers' hands for all the vehicles this week.

**10. Will this issue impact GM's May sales?**

A. We believe the impact, if any, will be minor.

**11. When and how will customers be notified of the program**

A. Customer letters will be sent via FedEx starting May 25.

**12. Is the compensation transferable?**

A. Yes.

# # #

**From:** David P. Garrett
**To:** Bunker, Byron
**Subject:** updated Holding Statement
**Date:** Wednesday, May 18, 2016 12:46:25 PM
**Attachments:** 43700 Label Q A_2016-05-18.docx

---

Byron –
Attached is an updated Holding Statement with GM Communications will use with any media inquiries.
The updates are to better respond to some of the recent media questions and speculation.

Best Regards,
Dave.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) office
mobile
david.p.garrett@gm.com

Q&A For 43700 - Fuel Economy Label Error
2016 Model Year Buick Enclave, Chevrolet Traverse, and GMC Acadia

MEDIA STATEMENT (Reactive only)
New emissions-related hardware in the 2016 Chevrolet Traverse, GMC Acadia and Buick Enclave, required new emissions testing for these vehicles. The fuel economy data from these tests were not captured in calculations made for EPA fuel economy labels for the 2016 model year Traverse, Acadia and Enclave (causing 2016 model year fuel economy numbers to be overstated). This error does not impact prior model year vehicles. Including these new data yields fuel economy results of 15/22/18 – FWD and 15/22/17 – AWD. This error was discovered as GM engineers worked on the 2017 model year labels, and was quickly reported to EPA. We continue to work with the EPA on this issue.

**What about vehicles from prior model years? How can you be certain you didn't overstate those numbers?**
As we said, the engineering change was for the 2016 model year Traverse, Acadia and Enclave, a population of approximately 240,000 vehicles. The new emission certification tests were required only for those vehicles.

**Which vehicles are involved?**
All 2016 model year Buick Enclave, Chevrolet Traverse, and GMC Acadia vehicles.

**Which label is involved?**
The Monroney window label that includes the fuel economy label and pricing information for the vehicle.

**What is the condition?**
An error was discovered on the fuel economy label on these vehicles. The error caused the EPA estimated fuel economy to be listed on the window label as 1-2 MPG higher than it should have been. Actual MPG will depend upon driving conditions and driver behavior. GM has informed the EPA about this condition.

**What are the corrected 2016 model year fuel economy values?**
The EPA approved estimated fuel economy values are as follows:
FWD: Combined City/Hwy 18 MPG, City 15 MPG, Highway 22 MPG
AWD: Combined City/Hwy 17 MPG, City 15 MPG, Highway 22 MPG
Detailed information will be provided on the corrected label.

**When will the corrected labels be provided?**
- EPA's fueleconomy.gov website was updated with the corrected values on Friday, May 13 a.m.
- GM has printed replacement labels for all unsold vehicles located at dealers. Chevrolet dealers began receiving replacement labels on Saturday May 14; replacement labels for unsold vehicles have been shipped to all US dealers (Chevrolet, Buick, GMC) as of Tuesday May 17
- Replacement labels for vehicles already in customer use will be sent to the owners' address of record

**How did GM discover this condition?**

The error was discovered as GM engineers worked on the 2017 model year label. They found that the 2016 model year label was calculated incorrectly.

**What about the sold vehicles with the error?**
GM will contact owners of the affected models to address this situation.

**Does this affect the safety or drivability of the vehicle?**
No. Customers can continue to operate their vehicle.

**Is it possible that the Enclave, Traverse, Acadia, and also the discontinued Saturn Outlook may have been incorrect for years?**
The 2016 MY mislabeling issue does not impact prior model years.

**Has EPA asked GM to document the reasons for the difference between the 2009 and 2016 results including the test cycle statistics.**
We will review our data with the EPA to address any questions they may have.

Updated 5/18/16 11:05 NPR

**From:** David P. Garrett
**To:** Bunker, Byron
**Subject:** FW: Final Statement
**Date:** Tuesday, May 17, 2016 6:29:21 PM

---

Byron -
The message below includes the final "holding statement" and Q&A which GM will use to respond to media inquiries.
We do not, at this time, intend to make a proactive statement.

Chevrolet dealers began receiving replacement Monroney labels on Saturday May 14; other dealers have continued to receive labels since then.
Replacement labels should be received by all US Chevrolet, GMC, and Buick dealers by tomorrow morning, Wednesday May 18.

Best Regards,
Dave.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) office
mobile
david.p.garrett@gm.com

**From:** Nick Richards
**Sent:** Tuesday, May 17, 2016 6:22 PM
**To:** David P. Garrett <david.p.garrett@gm.com>
**Subject:** RE: Final Statement
New emissions-related hardware in the 2016 Chevrolet Traverse, GMC Acadia and Buick Enclave, required new emissions testing. That data was not captured in calculations made for EPA fuel economy labels and caused 2016 model year fuel economy numbers to be overstated by 1-2 miles per gallon for these vehicles. Including these new data yields fuel economy results of 15/22/18 – FWD and 15/22/17 – AWD. This error was discovered as GM engineers worked on the 2017 model year labels, and was quickly reported to EPA. We continue to work with the EPA on this issue.
Q. Has EPA asked GM to document the reasons for the difference between the 2009 and 2016 results including the test cycle statistics.
**A. GM is working with the EPA on this issue.**

Q. Is it possible that the Enclave, Traverse, Acadia, and also the discontinued Saturn Outlook may have been incorrect for years?
**A. We are reviewing our data with the EPA to address any questions they may have.**

Nick Richards
GM Product Development Communications Manager
(b) (6) [redacted]

**From:** David P. Garrett
**To:** Bunker, Byron
**Subject:** FW: Holding statement
**Date:** Tuesday, May 17, 2016 3:41:27 PM

---

Byron -
Our intent is to use the following "holding statement" and Q&A to respond to media inquiries. We do not, at this time, intend to make a proactive statement.

Chevrolet dealers began receiving replacement Monroney labels on Saturday May 14; other dealers have continued to receive labels since then.
Replacement labels should received by all US Chevrolet, GMC, and Buick dealers by tomorrow morning, Wednesday May 18.

Best Regards,
Dave.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) office
mobile
david.p.garrett@gm.com

-----Original Message-----
**From:** Nick Richards [nick.richards@gm.com]
**Received:** Tuesday, 17 May 2016, 3:31PM
**To:** David P. Garrett [david.p.garrett@gm.com]
**Subject:** Holding statement

David

Below is the holding statement we will provide media to answer questions related to the fuel economy labels in the 2016 Chevrolet Traverse, GMC Acadia and Buick Enclave.

**MEDIA STATEMENT**
On May 11, 2016, General Motors issued a stop sale on 2016 model year Chevrolet Traverse, GMC Acadia and Buick Enclaves due to an error which affected the fuel economy information on the fuel economy label of these vehicles. The error caused the EPA estimated fuel economy to be listed on the window label as 1-2 MPG higher than it should have been. GM stopped sale of the affected models until a corrected label is printed and affixed.

A new catalytic converter was used in the 2016 Chevrolet Traverse, GMC Acadia and Buick Enclave,

requiring new emissions testing. That testing yielded new fuel economy estimates, based on today's application of more rigorous EPA metrics and test methodology. That data was not captured in calculations made for EPA fuel economy labels and caused 2016MY fuel economy numbers to be overstated by 1-2 miles per gallon for these vehicles. This error was discovered as GM engineers worked on the 2017 model year labels, and was quickly reported to EPA. We continue to work with the EPA on this issue.

Cheers,

Nick Richards
GM Product Development Communications Manager
(b) (6) [redacted]

**From:** David P. Garrett
**To:** Bunker, Byron; Wehrly, Linc
**Subject:** FW: Auto News Story
**Date:** Friday, May 13, 2016 3:12:18 PM

---

This just came across ...

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

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mobile
david.p.garrett@gm.com

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GM grounds large '16 crossovers with overstated EPA mileage labels – Automotive News
Inadvertent 'data transmission' discovered by engineers
May 13, 2016 @ 2:15 pm
Mike Colias
http://www.autonews.com/article/20160513/RETAIL05/160519919/gm-grounds-large-16-crossovers-with-overstated-epa-mileage-labels

DETROIT -- General Motors instructed dealers to stop selling their entire inventory of about 60,000 Chevrolet Traverse, GMC Acadia and Buick Enclave large crossovers as the company scrambles to replace incorrect EPA labels that overstate the vehicles' fuel-economy ratings.
GM notified dealers Wednesday that an "inadvertent error" listed the EPA fuel economy ratings "as 1-2 MPG higher than it should have been," according to a memo sent to all U.S. Chevy, Buick and GMC dealers and obtained by Automotive News.
"GM is stopping sale of the affected models until a corrected label is printed and affixed," the memo reads. A document sent to dealers lists 59,823 vehicles that cannot be delivered to customers until they get the correct label.
A separate memo sent to dealers Friday said replacement labels should "start arriving at dealerships" on Saturday and that all of them should arrive by Tuesday. Known as the Monroney sticker, the label shows the EPA's official fuel-economy ratings for the vehicle, along with pricing and other information.
GM spokesman Tom Wilkinson confirmed that GM has grounded all '16 Traverse, Acadia and Enclave models. He said GM is working with its supplier to print and overnight labels to dealerships. He didn't provide a timeline for when they are expected to be delivered.
"We're working as quickly as possible to fix the problem and get the labels shipped," Wilkinson said. He said an inadvertent "data transmission" was responsible for the mistake.
The correct EPA ratings for all-wheel-drive models of all three crossovers are 15 mpg in city driving and 22 mpg on the highway for a combined rating of 17 mpg. The incorrect label showed 17 city, 24 highway and 19 combined.
Wilkinson said GM notified the EPA as soon as it discovered the error and is in discussions with the agency on the handling of the matter. An EPA spokeswoman said she could not immediately comment.
Tens of thousands more of the crossovers were purchased by customers with the erroneous

labels since the '16 models went on sale last fall, Wilkinson confirmed. He said GM will notify customers of the error and send them corrected labels. The company is sorting through its plan to address any customer complaints that might arise.
It's unclear whether GM could face government fines or penalties because of the error.
Through April this year, GM dealers sold 39,105 Traverses, 17,457 Enclaves and 25,575 Acadias, according to the Automotive News Data Center. The bulk of those likely were '16 models, but the total would also include '15s.
GM told dealers in the initial memo that the error was discovered by GM engineers as they worked on the Monroney label for the 2017 model year.
GM also is advising dealers to correct or remove any marketing materials, including showroom vehicle-information booklets, that show the incorrect fuel economy figures.

**From:** David P. Garrett
**To:** Bunker, Byron; Wehrly, Linc
**Cc:** Barbara Kiss; Wright, DavidA; William Beggs; Jonathon Packard
**Subject:** RE: Stop Delivery Order - GM Reference # 43700
**Date:** Friday, May 13, 2016 3:11:13 PM

---

No need for a more formal request. I'll ask Bill Beggs to assemble the information to review with your team ASAP.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) office
mobile
david.p.garrett@gm.com

**From:** Bunker, Byron [mailto:bunker.byron@epa.gov]
**Sent:** Friday, May 13, 2016 2:53 PM
**To:** David P. Garrett <david.p.garrett@gm.com>; Wehrly, Linc <wehrly.linc@epa.gov>
**Cc:** Barbara Kiss <barbara.kiss@gm.com>; Wright, DavidA <Wright.DavidA@epa.gov>
**Subject:** RE: Stop Delivery Order - GM Reference # 43700

Dave,

Thank you for the update.

We would like General Motors to investigate and inform us of your findings regarding the reasons for the significant difference in fuel consumption for the 2009 EDV with these Original Test Vehicle Parameters:
ETW = 5500
RLHP = 18.9
N/V = 26.2

With the 2016 EDV results with these New Test Vehicle Parameters:
ETW = 5500
RLHP = 18.4
N/V = 26.0

Our intuition is that the 2016 vehicle should have lower fuel consumption than the 2009, but we understand your test results show the 2009 with approximately 10 percent lower fuel consumption. You should look into any effects that you believe relevant but at minimum, we would like GM at minimum to investigate the potential impact of the integrated work over the drive cycle (i.e., drive cycle metrics).

Please let me know if we need to make a more formal request for GM to respond.

Thanks,

Byron

**********

Byron Bunker
Director Compliance Division
Office of Transportation and Air Quality
Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, MI 48105
Bunker.Byron@epa.gov
Phone: (734) 214-4155
Mobile: (734) 353-9623
**********

**From:** David P. Garrett [mailto:david.p.garrett@gm.com]
**Sent:** Thursday, May 12, 2016 8:05 PM
**To:** Bunker, Byron <bunker.byron@epa.gov>; Wehrly, Linc <wehrly.linc@epa.gov>
**Cc:** Barbara Kiss <barbara.kiss@gm.com>
**Subject:** RE: Stop Delivery Order - GM Reference # 43700

Byron and Linc –
Just a couple of quick follow-up from our conversation this morning.

1. Tom Wilkinson from Communications confirmed that we are not planning any proactive media release on this issue. We will use the information in the stop delivery message and Q&A to respond to any media queries. While we will, of course, address any questions, we don't intend to initiate media coverage as we believe that would generate a lot of noise with no real benefit to customer communications. Should that change, we will make sure you have information to share with them so we can stay consistent.
   We will be communicating directly with each customer by mail, accompanied with a replacement label. We will keep you posted as those communications are finalized.

2. Printing of replacement vehicles begins in an overnight batch tonight.
   The first lot of ~70,000 labels will run throughout the weekend on an around-the-clock basis until completed. Current estimate is for completion on Monday May 16. Printing is scheduled in batches with all VINs for each dealer in a single batch, to be dispatched via FedEx Overnight delivery as each batch is completed. The batches completed on Friday May 13 should be delivered to their dealers on Saturday May 14. We anticipate replacement labels for all vehicles on Stop Delivery to be at the respective dealers no later than Wednesday May 18.
   Once the labels have been printed for the unsold vehicles, we will begin immediately to print labels to be mailed to customers of vehicles already sold.

3. Efforts are underway in the marketing departments at Chevrolet, Buick, and GMC to purge all reference to the incorrect FE values ... from websites, brochures, product information books, point-of-sale advertisements, etc. Websites are being updated with correct values. Print materials will be made available as PDF files for dealers to use on demand.

Please let me know if you have any questions.

Best Regards,
Dave.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) office
mobile
david.p.garrett@gm.com

**From:** David P. Garrett
**Sent:** Thursday, May 12, 2016 6:03 AM
**To:** 'Byron J. Bunker (bunker.byron@epa.gov)' <bunker.byron@epa.gov>
**Subject:** FW: Stop Delivery Order - GM Reference # 43700

Byron –
This message was sent to all Chevrolet, Buick, and GMC dealers yesterday.
Approximately 70,000 vehicles are now on hold at dealers, pending delivery of a replacement Monroney Label.

My best opportunities to talk today are:
9:00 – 10:00,
11:00 – 1:00, or
after 5:00

please let me know if any of these are convenient for you, and we can set aside some time to talk.

Best Regards,
Dave.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) office
mobile
david.p.garrett@gm.com

**From:** Dealer Message Alert
**Sent:** Wednesday, May 11, 2016 5:53 PM
**Subject:** Stop Delivery Order - GM Reference # 43700

The attached were sent to Buick, Chevrolet, and GMC dealers today.

**Do not reply to this message. This mailbox is not monitored.**



Nothing in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included in this message.

Confidentiality Note: This message is intended only for the person or entity to which it is addressed. It may contain confidential and/or privileged material. Any review, transmission, dissemination or other use, or taking of any action in reliance upon this message by persons or entities other than the intended recipient is prohibited and may be unlawful. If you received this message in error, please contact the sender and delete it from your computer.

**From:** David P. Garrett
**To:** Bunker, Byron
**Subject:** Automatic reply: Stop Delivery Order - GM Reference # 43700
**Date:** Friday, May 13, 2016 2:53:12 PM

---

**I am out of the office on vacation.**

I plan to return to the office on Tuesday May 17.

My access to internet and/or mobile phone may be limited during most of this time. I will reply, as needed, as quickly as I am able to do so.

**From:** David P. Garrett
**To:** Bunker, Byron; Wehrly, Linc
**Cc:** Barbara Kiss
**Subject:** RE: Stop Delivery Order - GM Reference # 43700
**Date:** Thursday, May 12, 2016 8:05:46 PM

---

Byron and Linc –
Just a couple of quick follow-up from our conversation this morning.

1. Tom Wilkinson from Communications confirmed that we are not planning any proactive media release on this issue. We will use the information in the stop delivery message and Q&A to respond to any media queries. While we will, of course, address any questions, we don't intend to initiate media coverage as we believe that would generate a lot of noise with no real benefit to customer communications. Should that change, we will make sure you have information to share with them so we can stay consistent.
   We will be communicating directly with each customer by mail, accompanied with a replacement label. We will keep you posted as those communications are finalized.

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Please let me know if you have any questions.

Best Regards,
Dave.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) office
mobile
david.p.garrett@gm.com

**From:** David P. Garrett
**Sent:** Thursday, May 12, 2016 6:03 AM
**To:** 'Byron J. Bunker (bunker.byron@epa.gov)' <bunker.byron@epa.gov>
**Subject:** FW: Stop Delivery Order - GM Reference # 43700

Byron –
This message was sent to all Chevrolet, Buick, and GMC dealers yesterday.
Approximately 70,000 vehicles are now on hold at dealers, pending delivery of a replacement Monroney Label.

My best opportunities to talk today are:
9:00 – 10:00,
11:00 – 1:00, or
after 5:00

please let me know if any of these are convenient for you, and we can set aside some time to talk.

Best Regards,
Dave.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC
(b) (6) office
mobile
david.p.garrett@gm.com

**From:** Dealer Message Alert
**Sent:** Wednesday, May 11, 2016 5:53 PM
**Subject:** Stop Delivery Order - GM Reference # 43700

The attached were sent to Buick, Chevrolet, and GMC dealers today.

**Do not reply to this message. This mailbox is not monitored.**

**From:** David P. Garrett
**To:** Bunker, Byron
**Subject:** RE: contact information
**Date:** Thursday, May 12, 2016 6:19:11 AM
**Attachments:** 43700 - Stop Delivery email sent 2016-05-11_1753.pdf
43700 - Stop Delivery message sent 5-11.pdf
43700 Label Q and A.pdf

---

Byron –
My earlier attempts to forward the message sent to dealers yesterday afternoon were rejected as undeliverable, so I'll try again by replying to this message.

David P. Garrett
Global Vehicle Emission Compliance
General Motors LLC

(b) (6) office
mobile
david.p.garrett@gm.com

> Byron –
> This message was sent to all Chevrolet, Buick, and GMC dealers yesterday. Approximately 70,000 vehicles are now on hold at dealers, pending delivery of a replacement Monroney Label.
>
> My best opportunities to talk today are:
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> 11:00 – 1:00, or
> after 5:00
>
> please let me know if any of these are convenient for you, and we can set aside some time to talk.
>
> Best Regards,
> Dave.
>
> David P. Garrett
> Global Vehicle Emission Compliance
> General Motors LLC
>
> (b) (6) office
> mobile
> david.p.garrett@gm.com

**From:** Bunker, Byron [mailto:bunker.byron@epa.gov]
**Sent:** Wednesday, May 11, 2016 8:20 PM
**To:** Barbara Kiss <barbara.kiss@gm.com>

**Cc:** David P. Garrett <david.p.garrett@gm.com>
**Subject:** Re: contact information

Thanks Barbara.

I really appreciate the quick follow up.

Thanks,

Byron

Sent from my iPhone

On May 11, 2016, at 8:18 PM, Barbara Kiss <barbara.kiss@gm.com> wrote:

> Byron,
> Per our discussion and your request, Tom Wilkinson, our Senior Manager in Communications is our communications contact. Dave Garrett will also give you a call tomorrow as we continue to understand better. Tom's contact info is as follows
>
> - (b) (6)
> -
> - (b) (6)
>
> **Barbara E. Kiss**
> **Director Energy and Environment, Global Public Policy**
> **barbara.kiss@gm.com**
> (b) (6)
>
> 

Nothing in this message is intended to constitute an electronic signature unless a specific statement to the contrary is included in this message.

Confidentiality Note: This message is intended only for the person or entity to which it is addressed. It may contain confidential and/or privileged material. Any review, transmission,

**David P. Garrett**

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**From:** Dealer Message Alert
**Sent:** Wednesday, May 11, 2016 5:53 PM
**Subject:** Stop Delivery Order - GM Reference # 43700
**Attachments:** 43700 - Stop Delivery message_sent 5-11.pdf; 43700 Label Q and A.pdf; 43700 US Inventory VIN List.xlsx

The attached were sent to Buick, Chevrolet, and GMC dealers today.

Do not reply to this message. This mailbox is not monitored.

Stop Delivery Order - GM Reference # 43700
Updated Date: May 11, 2016 17:45 ET

GLOBAL SAFETY FIELD INVESTIGATIONS
DCS4037
URGENT - DISTRIBUTE IMMEDIATELY

Date: May 11, 2016

Subject: Stop Delivery Order - GM Reference # 43700

Models: 2016 Buick Enclave
2016 Chevrolet Traverse
2016 GMC Acadia

To: All Buick, Chevrolet, and GMC Dealers

**STOP DELIVERY ORDER**

Effective immediately, stop the delivery of all 2016 model year Buick Enclave, Chevrolet Traverse, and GMC Acadia vehicles in new vehicle inventory. The GM reference number is 43700.

GM just discovered an inadvertent error which affected the fuel economy information on the fuel economy labels on the 2016 model year Acadia, Enclave and Traverse vehicles. The error caused the EPA estimated fuel economy to be listed on the window label as 1-2 MPG higher than it should have been. GM is stopping sale of the affected models until a corrected label is printed and affixed. GM will contact owners of the affected models to address this situation. This label error has no effect on the safety and operation of the vehicles.

**Effective immediately, dealers must hold the involved vehicles until corrected Monroney (fuel economy) window labels are received and affixed to all 2016 model year Buick Enclave, Chevrolet Traverse, and GMC Acadia vehicles.**

Until further instructions are received, involved new vehicles that are in dealers' possession must be held and not delivered to customers or dealer-traded until a corrected window label is affixed to the vehicle.

A list of involved vehicles that have been identified as being in dealer new vehicle inventory is attached to this message. It is sorted by dealer Business Associate Code (BAC) for easy reference. Your dealership's BAC will not be listed if none of the involved vehicles are currently in your new vehicle inventory.

Additionally, a file is attached that contains some anticipated questions and answers.

We are working to obtain replacement labels and will send them to dealers as quickly as possible. When replacement labels are available, they will be released with further instructions.

END OF MESSAGE
GLOBAL SAFETY FIELD INVESTIGATIONS

43700 Label Q and A.pdf
43700 US Inventory VIN List.xlsx

About this Alert

Reference Number: (b) (6) [redacted]

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Contact : loren.rusk@gm.com

**Q&A For 43700 - Fuel Economy Label Error**
**2016 Model Year Buick Enclave, Chevrolet Traverse, and GMC Acadia**

**Q1: Which vehicles are involved?**

A1: All 2016 model year Buick Enclave, Chevrolet Traverse, and GMC Acadia vehicles.

**Q2: Which label is involved?**

A2: The Monroney window label that includes the fuel economy and pricing information for the vehicle.

**Q3: What is the condition?**

A3: An inadvertent error was discovered on the fuel economy label on these vehicles. The error caused the EPA estimated fuel economy to be listed on the window label as 1-2 MPG higher than it should have been. Actual MPG will depend upon driving conditions and driver behavior. GM has informed the EPA about this condition.

**Q4: What are the corrected 2016 model year fuel economy values?**

A4: The EPA approved estimated fuel economy values are as follows:

FWD: Combined City/Hwy 18 MPG, City 15 MPG, Highway 22 MPG

AWD: Combined City/Hwy 17 MPG, City 15 MPG, Highway 22 MPG

Detailed information will be provided on the corrected label.

**Q5: When will the corrected labels be provided?**

A5: GM is working closely with the label supplier to obtain the corrected labels as quickly as possible.

**Q6: How did GM discover this condition?**

A6: The inadvertent error was discovered as GM engineers worked on the 2017 model year label. They found that the 2016 model year label was calculated incorrectly.

**Q7: Does this affect other models?**

A7: GM has checked and found no other models or model years were affected.

**Q8: What about the sold vehicles with the error?**

A8: GM will contact owners of the affected models to address this situation.

**Q9: Does this affect the safety or drivability of the vehicle?**

A9: No. Customers can continue to operate their vehicle.